

STATE OF VERMONT

SUPERIOR COURT
Windsor Unit

CIVIL DIVISION

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NOTICE OF POTENTIAL RULE 11 VIOLATIONS
and
ORDER TO SHOW CAUSE

Every person has a state constitutional right to seek a remedy with the courts, but with that constitutional promise comes an important responsibility: every person who files a civil lawsuit in a Vermont courthouse must ensure that (1) the lawsuit is not being presented for an improper purpose, (2) the claims are warranted by existing law or by a nonfrivolous argument for a change in the law, and (3) the allegations and other factual contentions have evidentiary support. Vt. R. Civ. P. 11(b)(1)–(3). These requirements are essential to the orderly administration of the justice system.

In the last three months, William White has filed more than 38 civil actions at the Woodstock courthouse, including the above-captioned matters. A careful review of each and every one of these complaints has resulted in a substantial concern that the actions being commenced by Mr. White are not compliant with the minimum standards imposed by Rule 11. For this reason, the court issues this notice of conduct and orders Mr. White to show cause why Rule 11 has not been violated, and why the sanctions described in this notice should not be imposed.

Notice of Conduct

The following image is a reproduction of the first complaint that Mr. White filed in this courthouse on May 4, 2023. It is representative of the appearance and content of each of the above-captioned matters:

STATE OF VERMONT

SUPERIOR COURT CIVIL DIVISION
 Unit Case No. 23-CV-1876

Plaintiff <u>William White</u>	Defendant(s) <u>Court system + Psychologists + Judge vs. The World + Universe, Planet Jupiter, Neptune, School system, all social media platforms, Trust control</u>
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COMPLAINT

My name is (print or type) William L. White

I am suing the person/people/organization/company listed above as defendant(s) because he/she/they/it did the following:

1. stalked me, got in my phone + harassed me with sand waves
2. also I can hear and fell through the phone the people on
3. the other sides tried to convict me as a child molester and a million other
4. things while trying to kill me the best goes on. Everything I and
(add additional numbered lines on separate page if necessary) My children went through and Tracy Zizzelsberger swing for out to love someone

I am asking for:

1. World leader
2. The Universe
3. More money than the world has ever known
4. To own the ground beneath our feet.

I believe the following rule or law applies:

1. _____
2. _____
3. _____

Numerous aspects of this complaint do not appear to be consistent with the Rule 11 obligations. First, the complaint appears to name defendants who are not persons or entities able to be sued in a state court proceeding (e.g., the world, the universe, the planet Neptune), as well as defendants who are described in terms of a class that is not reasonably likely to be ascertainable (e.g., all psychologists, all social media platforms), as well as defendants who may be individuals or entities capable of being identified, but against whom no discrete and understandable allegations have been made (e.g., the town justice system, the school system). It appears that similar deficiencies may be repeated throughout many of the complaints filed by the plaintiff.

Second, the complaint appears to include factual allegations that are incoherent, tangential with respect to their connections and associations, and not likely to be supported by admissible evidence. All of the complaints reference beliefs of a persecutorial nature, including that the defendants are seeking to somehow manipulate the plaintiff, or are otherwise attempting to kill him. A specific permutation of those beliefs appears to be that various defendants are using plaintiff's phone to harass him with sound waves. Many of the complaints appear to express a preoccupation with this particular belief.

Third, the complaint does not appear to seek relief that would be available in a state court or supported by a reasonable, good-faith basis to believe that the plaintiff would be entitled to the remedy sought. Many of the complaints ask for money damages in multiples of millions, billions, trillions, zillions, and quadrillions, or, as here; "more money than the world has ever known." Other complaints request that the defendants be incarcerated as a civil remedy, or seek declarations to the effect of being named world leader, or the president of a country, or ownership of a business or class of businesses. More concerning, as discussed below, some of the complaints reflect a desire for a climactic confrontation at the courthouse involving the plaintiff and those he perceives to be persecuting him. He frequently writes about these confrontations at the courthouse in connection with his preoccupation of the theme of attempted murder. These writings are inappropriate and deeply distressing, and raise a concern that plaintiff may present safety risks at the courthouse to himself or others.

Finally, as with the above complaint, none of the complaints filed with the court identify a rule or law that plaintiff believes may apply to the situation.

The lawsuits are not harmless. Each of the complaints that is filed must be received by the judicial assistant at the courthouse window and scanned into an electronic format. The judicial assistant must then docket the complaint by creating new entries in the computer system for the new case, the parties involved in the case, and the claims involved in the case. The judicial assistant must then prepare summonses corresponding to the number of defendants named in the complaint. Some of the summonses have been served, and many of the served defendants have filed notices of appearances, answers, and motions to dismiss, each of which must be docketed, and which represent investments of time and money not only for the judicial assistants but also for those who have been served with complaints that do not appear to meet the minimum expectations of Rule 11. "Every paper filed with the Clerk of this Court, no matter how repetitious or frivolous, requires some portion of the institution's limited resources." In re McDonald, 489 U.S. 180, 184 (1989).

The following paragraphs recite the essential features of each of the above-captioned complaint that appear to violate Rule 11, including an identification of the parties named in the complaint, the factual allegations set forth, the relief sought, the legal basis for the claims, and the burden imposed by the filing of the complaint. For purposes of readability and respect, names of defendants are not set forth in quotes even when the description of the defendant does not represent the identification of an ascertainable person, or even when the material appears to be inaccurate or erroneous. Additionally, plaintiff's material is generally paraphrased rather than quoted; the quotations are used only when the plaintiff's phrasing is more succinct than the court's synthesis.

23-CV-01876. William White v. THE WORLD AND UNIVERSE. Plaintiff filed this complaint on May 4, 2023 against the World and Universe, the Planet Neptune, the court system, psychologists, the town justice system, the school system, and all social media platforms. His factual allegations include persecutorial beliefs, including that the defendants were in his phone and making sound waves. He asked to be named world leader and to be given "the universe," "more money than the world has ever known," and "to own the ground beneath our feet." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 6 summonses and has required the judicial assistants to docket 9 documents totaling 28 pages of material.

23-CV-02111. William White v. Kenneth Smith. Plaintiff filed this complaint on May 17, 2023 against Kenneth Smith, Gordy Wells, John Mattern, the Green Mountain Gospel Chapel, Gene Bartlett and family, and Hannah Bartlett. His factual allegations included persecutorial themes involving people being in his phone and making sound waves. He asked for various amounts of millions, billions, or trillions of dollars and expressed a desire to confront the defendants in the courtroom. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 6 summonses and has generated multiple notices of appearances, answers, and motions, and has required the judicial assistants to docket 28 documents totaling 82 pages of material.

23-CV-02112. William White v. Walmart. Plaintiff filed this complaint on May 17, 2023 against the West Lebanon Walmart, Carolee Devito, Willie Clark, Jennifer Bussiere, Connor Wheatley, Sophie Roe, Rutland Country Radio, and the Zubcoff family. His factual allegations are too densely written to parse, but there are references to receiving sound waves through the radio and to individuals being "in my phone." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 8 summonses and has generated multiple notices of appearances, answers, and motions, and has required the judicial assistants to docket 26 documents totaling 76 pages of material.

23-CV-02113. William White v. Stacey Adamski. Plaintiff filed this complaint on May 17, 2023 against Stacey Adamski, Bethel Attorney Susan, Jack Kauders, Lauren Elmore, Melody Blanchard, and Killington Association. His factual allegations are persecutorial in nature and express a belief that the named defendants are trying to kill him. He asked for various amounts of money, expressed in terms of billions and trillions, and expressed a desire to confront the defendants in the courtroom. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of

this decision, the suit has required the preparation of 6 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 15 documents totaling 51 pages of material.

23-CV-02114. William White v. Robert Vaillancourt. Plaintiff filed this complaint on May 17, 2023 against Robert Vaillancourt, Wendy Barckley, Eric Richardson, four children, Tracy Zizzelsberger, and Kelly Green. His factual allegations are persecutorial in nature and express a belief that the named defendants are trying to kill him. He asked for various amounts of money, expressed in terms of millions, billions, and trillions, and expressed that he wanted to know “who does the phone sound waves.” He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 8 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 20 documents totaling 56 pages of material.

23-CV-02115. William White v. Joseph Strain. Plaintiff filed this complaint on May 17, 2023 against Joseph Strain, the Marsicovetere + Levine Law Group, Sean McGonigle and wife, Brian Amones, and Corey Richards and family. His factual allegations are persecutorial in nature and reflect a belief that the defendants are either in his phone or trying to kill him. He asked for various amounts of money, expressed in multiples of millions, billions, and trillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 5 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 14 documents totaling 34 pages of material.

23-CV-02116. William White v. Mary Ann Batchelor. Plaintiff filed this complaint on May 17, 2023 against Mary Ann Batchelor, Ann Batchler, Twin Farms, Chimney Savers Owner, and “Country + state business + world.” Plaintiff’s factual allegations are persecutorial in nature and reflect a belief that the named defendants are in his phone. He wrote that he was suing these defendants “to [own] every business that said they would sell in the world during this show the last few years.” He asked “to [own] all these businesses” and for various amounts of money in multiples of millions and billions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 7 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 13 documents totaling 43 pages of material.

23-CV-02117. William White v. Sterling Giles. Plaintiff filed this complaint on May 17, 2023 against Sterling Giles, Will Berry, the Rickert family, the Levitt family, his family, his siblings, his cousins, and Holly Wolff and her son. Plaintiff’s factual allegations are persecutorial in nature and express a belief that the named defendants “know about the social media and the phone buzz” and are otherwise attempting to kill him or are “not telling me the truth.” He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 9 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 23 documents totaling 76 pages of material.

23-CV-02118. William White v. Ian Plank. Plaintiff filed this complaint on May 17, 2023 against Ian Plank, Gary Zizzesberger, Lucy Meta, Cassidy Elis Dezan, his parents, his siblings, and Bryttny White. His factual allegations are persecutorial in nature and express a belief that the named defendants are trying to kill him. He asked for various multiples of millions of dollars and for the defendants to be incarcerated. He expressed a desire to confront the defendants in the courtroom. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 6 summonses and has required the judicial assistants to docket 3 documents totaling 22 pages of material.

23-CV-02119. William White v. Superior Court. Plaintiff filed this complaint on May 17, 2023 against the Superior Court, the White River Valley School District, Craig Wortman, Joan Wortman, and the South Royalton State Police Barracks. Plaintiff's factual allegations are persecutorial in nature. He asked for amounts of money in multiples of trillions and for the defendants to be incarcerated. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 5 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 18 documents totaling 46 pages of material.

23-CV-02166. William White v. Melody Blanchard. Plaintiff filed this complaint on May 22, 2023 against Melody Blanchard, his parents, Teen Challenge VT, Rick Warren, Josh Mather and Family, Juan Andrew and Leah Cross. Plaintiff's factual allegations are persecutorial in nature and express a belief that various defendants are in his phone. He asked for various amounts of money in multiples of billions and trillions and asked for the court to declare him the owner of "Cedar Brook." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 6 summonses and has generated multiple notices of appearances, answers, and motions to dismiss, and has required the judicial assistants to docket 7 documents totaling 31 pages of material.

23-CV-02170. William White v. Randolph Radio Station 102.1. Plaintiff filed this complaint on May 22, 2023 against Randolph Radio Station 102.1, the Pump and Pantry in Williamstown, Elon Musk, Bill Gates, and the owner of Facebook. Plaintiff's factual allegations are that he "got the sound wave and headache" after visiting the Pump and Pantry, and after listening to the radio station. He wrote that he was suing to own the pharmaceutical industry and social media. He asked for various amounts of money in multiples of millions and trillions. He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed motions to dismiss. As of the date of the preparation of this decision, the suit required the preparation of six summonses and has generated 13 documents totaling 37 pages of material.

23-CV-02173. William White v. USA Country. Plaintiff filed this complaint on May 22, 2023 against USA Country, United Nations, Kathy Rohloff and Husband, and Alban Sulejmani. Plaintiff's factual allegations included themes of persecution and people and entities being in his phone. His requests for relief included requests to be named world leader and for various amounts of money in multiples of millions and trillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 4

summonses and has required the judicial assistants to docket 3 documents totaling 16 pages of material.

23-CV-02180. William White v. White River Valley Schools. Plaintiff filed this complaint on May 22, 2023 against White River Valley Schools, South Royalton Law School, Erica Parker, and Worthy Burger. Plaintiff's factual allegations are persecutorial in nature and otherwise reflect a belief that the defendants are in his phone. He asked for various amounts of money in multiples of millions and trillions and "to own" the law school and the restaurant, as well as "jail program for leaders at school." He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed motions to dismiss. As of the date of the preparation of this decision, the suit required the preparation of four summonses and has generated 18 documents totaling 54 pages of material.

23-CV-02183. William White v. Kim Kraus. Plaintiff filed this complaint on May 22, 2023 against Kim Kraus, the Boy Scouts, the Court Room, Government, the Town of Bethel, and the State of Vermont. He wrote that he was suing for "every donation donated during this show and every sue I am the people and I sue for the people – whiskey on the table Mexico coca-cola cannabis on the side tincture." Other claims are equally incoherent. He asked for various amounts of money in multiples of trillions and other incoherent relief. He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed motions to dismiss. As of the date of the preparation of this decision, the suit required the preparation of four summonses and has generated 12 documents totaling 29 pages of material.

23-CV-02186. William White v. Paul Lambert. Plaintiff filed this complaint on May 22, 2023 against Paul Lambert, Casey Griffin, Luck, Becky Ward, Sarah Cloud, and Red Door Jewelry. He wrote that he was suing the individual defendants for being in his phone. His factual allegations otherwise reflect persecutorial beliefs. He asked for various amounts of money in multiples of millions and billions and "truth." He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed motions to dismiss. As of the date of the preparation of this decision, the suit required the preparation of four summonses and has required the clerks to docket 13 documents totaling 68 pages of material.

23-CV-02190. William White v. Zack Zerbe. Plaintiff filed this complaint on May 22, 2023 against Zack Zerbre, Grace and Brian LaFromboise, Ron Rilling, Faithanne McKenzey, and all phone companies. Plaintiff's factual allegations reflect persecutorial beliefs. He wrote that he was suing the phone companies for "allowing people in my phones and other people to be able to do the phone buzz, sound wave," and he wrote that the phone companies "should have informed people about this issue." He asked for various amounts of money in multiples of billions and trillions and "truth." He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed answers. As of the date of the preparation of this decision, the suit required the preparation of six summonses and has required the clerks to docket 9 documents totaling 32 pages of material.

23-CV-02191. William White v. The White Side of My Family: Uncles, Aunts, Cousins. Plaintiff filed this complaint on May 22, 2023 against his uncles, aunts, and cousins, along with Lorraine Gelinas, Janie Findberg, and the courthouse. He expressed a belief that the individual defendants were in his phone. He wrote that he wanted the “[t]ruth about the school system.” He expressed a belief that his family members were trying to kill him. He asked for various amounts of money in multiples of trillions and “truth” and “change justice system.” He did not identify a rule or law that he believed applied to the situation. Various defendants have entered appearances and filed answers. One of the people affected by this filing describes herself as a 78-year-old woman who lives alone, and who had hired plaintiff as a painter some years ago and had not been in contact with him until recently, when they encountered each other as passers-by on a road; she wrote that it was “troublesome and scary” to have been identified by the plaintiff in this lawsuit. As of the date of this decision, the suit required the preparation of four summonses and has required the clerks to docket 10 documents totaling 33 pages of material.

23-CV-02206. William White v. Paul Mahaffy. Plaintiff filed this complaint on May 22, 2023 against Paul Mahaffy, Derek Merusi, Thomas Gauthier, Wendy Wells, Stacey Barcomb, Wayne Townsend, Jennifer Paradise, Emma Hombrook, Shelby Jenkins, Husband Mike, Owen Daniel-McCarter, Adam Wright, Douglas Marshall, Chuck Adams, Sandra Adams, Lisa White, Casey + Corey Novotny, Tom Harty, Cass Bath, Chelsie Brown, Jeff Washburn, Chelsea Boardman, and Cody Slack. He wrote simply that “all these people were in my phone some did the buzz – sound wave and have other things they need convicting of.” He asked for \$100 trillion dollars. He did not identify a rule or law that he believed applied to the situation. As of the date of the preparation of this decision, the suit required the preparation of 24 summonses and has required the clerks to docket 5 documents totaling 99 pages of material.

23-CV-02345. William White v. Principal Owen Bethel School. Plaintiff filed this complaint on June 1, 2023 against Principal Owen of the Bethel School. Plaintiff wrote that he was suing this person because “he [knew] about the phone and [everyone] in it and the harassment,” and that he “never came to me and talked to me about the situation and would have lied to me let the school go out of control.” He asked for a sum of money in multiples of trillions “and the truth about what happened.” He also expressed a desire for a courtroom confrontation. He did not identify a rule or law that he believed applied to the situation. As of this date, the court has not yet drafted the summons for this case, but the filing of the complaint has required the clerks to docket 3 documents totaling 7 pages of material.

23-CV-02462. William White v. Orange County Parent Child Center. Plaintiff filed this complaint on June 8, 2023 against the Orange County Parent-Child Center. He wrote that he was suing the parent-child center because it was “in my phone and turned me down so I couldn’t see my kids when I was perfectly capable to see them and they had space.” He asked for \$100 trillion in damages. He did not identify a rule or law that he believed applied to the situation. Defendant has entered an appearance and filed a motion to dismiss. As of the date of preparation of this decision, the suit has required the preparation of a summons and has required the judicial assistants to docket 6 documents totaling 10 pages of material.

23-CV-02464. William White v. Peter Ticktin and His Partner. Plaintiff filed this complaint on June 8, 2023 against Peter Ticktin and his partner, and Bob Sherwin and his wife. His factual allegations reflect persecutorial beliefs that the individual defendants are in his phone and are trying to kill him. He asked for money damages in multiples of millions and quintillions and wrote that he was seeking “prison” and “program.” He also wrote that “I want them in the court room plus me” and “Attempted Murder.” He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 2 summonses and has required the judicial assistants to docket 6 documents totaling 12 pages of material.

23-CV-02498. William White v. Court House and Room. Plaintiff filed this complaint on June 9, 2023 against the Court House, the Court Room, and Joseph Strain. He wrote that he was suing the defendants “for contact information.” He asked for “10,000 million to keep me moving forward until we get done the rest of my sues,” and wrote that he would “like to continue to move forward to change the justice system and get the truth out of people.” He did not identify a rule or law that he believed applied to the situation. Both defendants have entered notices of appearance and filed motions to dismiss. As of the date of preparation of this decision, the suit has required the preparation of 2 summonses and has required the judicial assistants to docket 10 documents totaling 20 pages of material.

23-CV-02509. William White v. White River Courtroom. Plaintiff filed this complaint on June 12, 2023 against the White River Courtroom, Joseph Strain, Marsciovetere and Levine Law Group, and the Windsor County Sheriff’s Department. His factual allegations reflect persecutorial beliefs that the defendants are harassing him “with the sound wave through the phone.” He asked for an amount of money in multiples of trillions. He did not identify a rule or law that he believed applied to the situation. Various defendants have entered notices of appearance and filed motions to dismiss. As of the date of preparation of this decision, the suit has required the preparation of 4 summonses and has required the judicial assistants to docket 12 documents totaling 29 pages of material.

23-CV-02568. William White v. Craig Wortman. Plaintiff filed this complaint on June 14, 2023 against Craig Wortman. He wrote that he was suing the defendant because the defendant “sold his chimney sweep business to me” and “has been helping give customers to other people instead of working for me.” He also wrote that the defendant “was also involved in purposely trying to get me murdered and blasting me and my family and trying to get people to claim things about me that were not true.” He asked for “prison” and “\$100 Trillion.” He did not identify a rule or law that he believed applied to the situation. Defendant has filed a notice of appearance, a motion to dismiss, and a motion for sanctions under Rule 11. As of the date of preparation of this decision, the suit has required the preparation of 1 summons and has required the judicial assistants to docket 8 documents totaling 17 pages of material.

23-CV-02570. William White v. South Royalton Law School. Plaintiff filed this complaint on June 14, 2023 against South Royalton Law School and Norwich University Law School. His factual allegations reflect persecutorial beliefs. He asked for “\$100 quadrillion” in damages. He did not identify a rule or law that he believed applied to the situation. Both defendants have filed a notice of appearance and motions to dismiss. As of the date of preparation of this decision, the suit has

required the preparation of 2 summonses and has required the judicial assistants to docket 11 documents totaling 25 pages of material.

23-CV-02646. William White v. Windsor Court Office Ladies. Plaintiff filed this complaint on June 20, 2023 against the Windsor Court Office Ladies. Plaintiff's factual allegation was that he wanted "all my sues to be put through" and that he wanted contact information for various people. He asked for contact information and an amount of money in multiples of trillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of a summons and has required the judicial assistants to docket 3 documents totaling 7 pages of material.

23-CV-02648. William White v. Every Law School in the Country. Plaintiff filed this complaint on June 20, 2023 against every law school in the country. Plaintiff's factual allegations reflect persecutorial beliefs about the law schools being in his phone. He asked for an amount of money in multiples of zillions and for "prison programs." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of a summons and has required the judicial assistants to docket 3 documents totaling 6 pages of material.

23-CV-02652. William White v. Every Law Firm and Group in the Country. Plaintiff filed this complaint on June 20, 2023 against every law firm and group in the county. Plaintiff's factual allegations were that law firms are "a lot of the problem with [society]," and were otherwise persecutorial in nature and referenced the law firms being "in my phone." He asked for an amount of money in multiples of zillions and asked the court to order the law firms "to stop letting people do the sound wave through the phone." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of a summons and has required the judicial assistants to docket 3 documents totaling 6 pages of material.

23-CV-02656. William White v. Marilyn White. Plaintiff filed this complaint on June 20, 2023 against Marilyn White, Stacey Adamski, Susan, Wendy Barclay, Kelly Green, and Marsicovetere and Levine Law Group. Plaintiff's factual allegations reflect persecutorial beliefs. He asked for an amount of money in multiples of zillions and for the court to "put people in prison set an example." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 6 summonses and has required the judicial assistants to docket 8 documents totaling 21 pages of material.

23-CV-02751. William White v. John Mattern. Plaintiff filed this complaint on June 23, 2023 and named as defendants: John Mattern, Tracy Zisselsberger, and Jack from Utah. Plaintiff's factual allegations reflect persecutorial beliefs that the defendants are trying to kill him. He asked for an amount of money in multiples of trillions and for defendants to be imprisoned. He expressed a desire to confront these people in the courtroom and wrote "attempted murder." Exactly what he means or intends by this is unclear. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 3 summonses and has required the judicial assistants to docket 5 documents totaling 13 pages of material.

23-CV-02752. William White v. All Psychologists in America. Plaintiff filed this complaint on June 23, 2023 against all psychologists in America and all courts in America. Plaintiff's factual allegations reflect persecutorial beliefs that the defendants are trying to kill him. He asked for an amount of money in multiple of zillions and expressed a desire to confront these people in the courtroom and wrote "attempted murder." Exactly what he means or intends by this is unclear. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 2 summonses and has required the judicial assistants to docket 4 documents totaling 10 pages of material.

23-CV-02754. William White v. President Joe Biden. Plaintiff filed this complaint on June 23, 2023 against President Joe Biden, the Bethel VT School, and all other schools in America. Plaintiff's factual allegations reflect persecutorial beliefs that the defendants are trying to kill him. He asked for impeachment of the president, to be named as president for the remainder of the presidential term, and for amounts of money in multiples of zillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 3 summonses and has required the judicial assistants to docket 5 documents totaling 12 pages of material.

23-CV-02756. William White v. Chittenden Sheriff's Department. Plaintiff filed this complaint on June 23, 2023 against the Chittenden Sheriff's Department and all others in the state. His factual allegations are that the named defendants "have information on people's address and can get it easily but act like they can't do anything." He asked for amounts of money in multiples of trillions and for the police to be incarcerated. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 2 summonses and has required the judicial assistants to docket 4 documents totaling 10 pages of material.

23-CV-02803. William White v. Every Psychotherapist in the Country. Plaintiff filed this complaint on June 27, 2023 against every psychotherapist in the country, David Pellegrino, and Marsicovetere and Levine Group, P.C. Plaintiff's factual allegations were persecutorial in nature and requested contact information for others. He asked for an amount of money in multiples of zillions and asked the court to order "people to stop messing with people." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 3 summonses and has required the judicial assistants to docket 5 documents totaling 13 pages of material.

23-CV-02806. William White v. Vermont Superior Court. Plaintiff filed this complaint on June 29, 2023 against the Vermont Superior Court and United States Supreme Court. Plaintiff's factual allegations are not coherent enough to paraphrase. He asked for the courts to "make me and my family the most successful in the world." He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 2 summonses and has required the judicial assistants to docket 4 documents totaling 10 pages of material.

23-CV-02888. William White v. Every Hospital in the World. Plaintiff filed this complaint on July 5, 2023 against every hospital in the world and every court in the world. Plaintiff's factual allegations are not coherent enough to paraphrase. He expressed that he wanted himself and certain close family members to live for one thousand years or more. He also asked for an amount of money in multiples of zillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 3 summonses and has required the judicial assistants to docket 5 documents totaling 13 pages of material.

23-CV-02889. William White v. Bethel Town. Plaintiff filed this complaint on July 5, 2023 against Bethel Town, Windsor County, Orange County, and Marsicovetere and Levine Law Group. He wrote that he was suing them for recordings from his phone and wrote that he wanted to know "who they had in my phone at different times during this show." He expressed a belief that the defendants were trying to murder him. He asked for "all the recordings and videos from these phones especially mine," and amounts of money in multiples of millions and zillions. He did not identify a rule or law that he believed applied to the situation. As of the date of preparation of this decision, the suit has required the preparation of 4 summonses and has required the judicial assistants to docket 6 documents totaling 17 pages of material.

Two of plaintiffs' complaints are not subject to this order: in Docket 23-CV-02185, a defendant removed the proceeding to federal court, and in Docket 23-CV-02344, the plaintiff sought custody of his children: that civil complaint is separately dismissed for lack of subject-matter jurisdiction.

All told, between May 4, 2023, and present, plaintiff has filed 38 civil actions that do not appear to meet the requirements of Rule 11. His filings have resulted in the preparation of 171 summonses and have required the clerks to file 370 documents totaling 1,171 pages of material. In addition, multiple filings have referenced a desire for confrontation at the courthouse, and these expressions are often coupled with references to murder or attempted murder. These expressions present a serious concern that plaintiff may present a risk of harm to himself or others when using the courthouse. This concern is heightened by the fact that plaintiff has named the Windsor judicial assistants as defendants in one of the civil actions described above.

It therefore appears to the court that the burden of these apparent Rule 11 violations upon the courthouse and the Vermont Judiciary, in terms of both workload and safety risk, is not tolerable. It is for these reasons that the court believes that the following sanctions, set forth on the next page, may be necessary.

ORDER TO SHOW CAUSE

Plaintiff is ordered to show cause why the court should not find a violation of Rule 11 and impose the following sanctions:

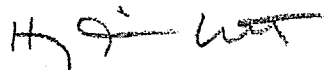
(1) Dismissal of all 38 of the above-referenced complaints for failure to comply with Rule 11;

(2) An order prohibiting plaintiff from filing any further complaints with the Vermont Superior Court, Windsor Unit, Civil Division unless the complaints are either signed by an attorney or approved by the presiding judge. Specifically, due to the safety concerns described above, the order would require the plaintiff to present any future complaints to the security officer at the door of the courthouse. If the complaint is signed by an attorney, the security officer will allow the plaintiff to proceed to the window for filing. If the complaint is not signed by an attorney, the security officer will receive the proposed filing, but will neither allow the plaintiff to proceed to the window nor accept any filing fee. Instead, the security officer will present the proposed filing to the judge after the plaintiff has left the building. The judge will respond in writing indicating whether the proposed filing complies with Rule 11 or not. If the proposed filing complies with Rule 11, plaintiff will receive a letter inviting the plaintiff to return to the courthouse to pay the filing fee. If the proposed filing does not comply with Rule 11, plaintiff will receive the original complaint returned to him in the mail, with a copy of the judge's letter indicating that the complaint was read but that it does not comply with Rule 11. A physical copy of the complaint and the judge's letter will be kept at the courthouse, but will not be scanned or otherwise docketed.

Plaintiff is ordered to show cause why Rule 11 has not been violated, and why the above sanctions should not be imposed, by filing one document of not more than five pages in length within 10 days of the file-stamped date of this order. The document should be submitted to the security officer at the courthouse door. The security officer will present the document to the judicial assistants for docketing. Any document presented by plaintiff that is not compliant with this order will be received by the security officer and presented to the judge after the plaintiff has left the building, but will not be docketed unless the judge certifies that the proposed filing complies with Rule 11.

In the meantime, for purposes of managing the pending cases: **all 38 of the above-referenced dockets are hereby stayed pending further action on the Rule 11 order to show cause.** A copy of this order and any final order on sanctions will be docketed in each case to which it applies, and sent to the defendants who have entered appearances in these actions. All defendants are specifically requested not to file any further documents with the court in the meantime.

Electronically signed on Thursday, July 27, 2023 pursuant to V.R.E.F. 9(d).



H. Dickson Corbett
Superior Court Judge

FILED

JUL 27 2023