

**Pro Se Defendants Gregory Stenstrom and Leah Hoopes**

**Gregory Stenstrom, Pro Se**

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**Leah Hoopes, Pro Se**

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**IN THE COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY PENNSYLVANIA  
(CIVIL DIVISION)**

**JAMES SAVAGE**

Plaintiff,

v.

**DONALD J. TRUMP,**

et al,

Defendants

**CASE ID NO.: 211002495**

**NOTICE OF PRESENTATION**

**MOTION TO DISMISS, AND  
ANSWER(S) TO PLAINTIFF'S MOTION  
TO DEEM ADMITTED REQUESTS FOR  
ADMISSION AND PLAINTIFF'S  
MOTION FOR SANCTIONS**

**GREGORY STENSTROM AND LEAH  
HOOPES**

**ORAL ARGUMENTS REQUESTED**

**NOTICE OF PRESENTATION**

TO: Plaintiff James Savage

J. Conor Corcoran, Esq. (Attorney for Plaintiff)

PLEASE TAKE NOTICE that Defendants Stenstrom's and Hoopes' Motion to Dismiss, and Answer to Plaintiffs Motions to Deem Requests for Admission by Defendants Stenstrom and Hoopes, and Plaintiff's Motion for Sanctions, incorporated herein, will be presented to the Court on [see e-notification] at 9 a.m., or as soon thereafter as counsel may be heard, in Courtroom [see e-notification], City Hall, Philadelphia, Pennsylvania.

Respectfully submitted,

(Signatures next page)



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Date: 10OCT2023

LEAH HOOPEES  
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Date: 10OCT2023

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AND PLAINTIFF'S MOTION  
FOR SANCTIONS**

**ATTORNEY CERTIFICATION OF GOOD FAITH (Pursuant to Civ. R. \*208.2(e))**

The undersigned Pro Se Defendants hereby certifies and attest that:

- a. Defendants have had the contacts described herein with opposing counsel regarding discovery matter contained in the subject discovery motions to resolve the specific discovery disputes, and Defendants have been unable to do so, as averred herein.
- b. Defendants have made good faith, but unsuccessful efforts described herein to contact opposing counsel in an effort to resolve discovery dispute.
- c. Defendants have accordingly made their attached responses and Motion to Dismiss herein pursuant to Pa.R.C.P. 231 §§ 4019 (a)(1)(i), 4019 (a)(1)(viii), and 4019(c)(5)

CERTIFIED TO THE COURT BY:

/s/ Gregory Stenstrom and Leah Hoopes

October 10th, 2023

**Pro Se Defendants Gregory Stenstrom and Leah Hoopes**

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**NOTICE TO PLEAD**

To Plaintiff:

You are hereby notified to file a written response to Defendants Stenstrom and Hoopes Motion to Dismiss and Answers to Plaintiff's Motions, within twenty (20) days from date of service hereof or a judgement may be entered against you.

/s/ Gregory Stenstrom and Leah Hoopes

**IN THE COURT OF COMMON PLEAS OF  
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**JAMES SAVAGE**

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HOOPES MOTION TO DISMISS, AND  
ANSWER(S) TO PLAINTIFF'S  
MOTION TO DEEM ADMITTED  
REQUESTS FOR ADMISSION AND  
PLAINTIFF'S MOTION FOR  
SANCTIONS**

*(Proposed Order included after Motion)*

**DEFENDANTS STENSTROM AND HOOPES MOTION TO DISMISS, AND  
ANSWER(S) TO PLAINTIFF'S MOTION TO DEEM ADMITTED REQUESTS FOR  
ADMISSION AND PLAINTIFF'S MOTION FOR SANCTIONS**

Defendants Stenstrom and Hoopes hereby submits this timely Motion to Dismiss pursuant to Pa.R.C.P. 231 §§ 4019 (a)(1)(i), 4019 (a)(1)(viii), and 4019(c)(5), and response to Plaintiff's Motion to Deem Admitted Requests for Admission filed on September 18, 2023, and Plaintiff's Motion for Sanctions filed on September 20<sup>th</sup>, 2023, and in support thereof, aver as follows:

**RESPONSE TO PLAINTIFF'S MOTIONS**

1. Defendants Stenstrom and Hoopes (still) admit only that Plaintiff's filed a Complaint as a means of commencing the instant action, Savage v. Trump, No. 2495, and respectfully refer the Court to the cited document for the true, accurate, and contextual meaning thereof.

2. Defendants Stenstrom and Hoopes responded to Plaintiffs' Interrogatories, Requests for Admissions, and Requests for Documents, in full, on July 15<sup>th</sup>, 2023, in compliance with Court order to do so.
3. Defendants Stenstrom and Hoopes filed Motion to Compel Plaintiff response to requests for Discovery, with certificate of contested discovery, and exhibits, on September 18<sup>th</sup>, 2023, (docket Control No.: 2309348) with required Response Date of 10/03/2023 (October 3<sup>rd</sup>, 2023).
4. Defendants Stenstrom and Hoopes (re)filed their Motion for Summary Judgment in favor of Defendants, on October 1<sup>st</sup>, 2023, at 10:48pm US EST (docket Control No.: 23100135), appearing on the docket on October 2<sup>nd</sup>, 2023, (at close of discovery), also with required Response Date of 10/03/2023 (October 3<sup>rd</sup>, 2023).
5. Plaintiff's attorney, J. Conor Corcoran, did NOT respond or object to either of Defendants Stenstrom's and Hoopes' above Motion to Compel, or Motion for Summary Judgment, by the required Response Date of October 3<sup>rd</sup>, 2023.
6. Instead of responding or referring to Defendants Stenstrom's and Hoopes' motions, Plaintiff's attorney, J. Conor Corcoran, completely ignored Defendants' motions and filed:
  - a. Plaintiff's Motion to Deem Admitted Requests for Admission (docket Control No.: 23093487) on September 18<sup>th</sup>, 2023, and,
  - b. Separate Plaintiff's Motion for Sanctions on September 20<sup>th</sup>, 2023 (docket Control No.: 23093918), and,
  - c. With neither of Plaintiff's motions providing any supporting citation or reference to Pa.R.C.P. 4019 (Sanctions) paragraphs, that would justify Plaintiff attorney's motion(s) narratives, or even acknowledging Defendants' motions, objections, and certification of contested discovery, that are disqualifying to Plaintiff's motions for "Deem Admitted Requests for Admission" or Sanctions.

7. Plaintiff's attorney, J. Conor Corcoran appears to operate in a parallel universe where he continuously ignores Defendants motions, responses, requests for discovery, requests for deposition, and required response dates, as well as having no respect for, and ignoring, this Courts Orders (Case Management Orders for Discovery among them), Rules of Civil Procedure, Rules of Professional Conduct, and does not even bother with citations of federal, state, local, common, or constitutional law, statutes, or code, to provide surface area for either Defendants to respond and prepare a defense, or for the Honorable Court to properly adjudicate, Plaintiffs' filings.
8. Hence, Defendants Stenstrom and Hoopes incorporated response herein, in an abundance of caution, to Plaintiff's presumed Pa.R.C.P. 231 §§ 4019 filings (which Plaintiff fails to cite), and Defendants incorporated motion to present, and its motion to dismiss in the attached proposed order and citations pursuant to Pa.R.C.P. 231 §§ 4019 (a)(1)(i), 4019 (a)(1)(viii), and 4019(c)(5).

**RESPONSE TO DEFENDANTS STENSTROM'S AND HOOPES SUBPOENA BY  
DELAWARE COUNTY**

9. Defendants Stenstrom and Hoopes filed Subpoenas to Delaware County on September 14<sup>th</sup>, 2023, for information specific to Plaintiff's claims of heart attacks, workplace threats, employment history, communications regarding missing USB vDrives, video of the counting center from Election week 2020, etc., for which Plaintiff has failed to provide any material facts in support of its complaint, throughout the 703 days since its filing instant complaint, and three modifications to the Court's Case Management Order and extensions of discovery.
10. Plaintiff's attorney, J. Conor Corcoran, filed Objection to Defendants Stenstrom's and Hoopes' subpoenas on September 20<sup>th</sup>, 2023, (with no Control No. assigned by Court), with objections to Defendants subpoena requests for specific documentation regarding Plaintiff's complaint, to Delaware County, PA, with Plaintiff stating, in brief, that the Defendants' subpoenas were "overly broad," "beyond the scope of the lawsuit," "irrelevant," and "overly

burdensome,” despite subject subpoenas high level of specificity in seeking any documentation that would support Plaintiff’s claims.

11. Delaware County has nevertheless since responded to Defendants Stenstrom’s and Hoopes’ subpoenas on October 2<sup>nd</sup>, 2023, with Certificate of Compliance from the Delaware County Solicitor, William Martin, that “**No documents or things responsive to this subpoena are in my possession.**” (see Exhibit A).
12. While the response by the Delaware County Solicitor Martin to Defendants Stenstrom’s and Hoopes’ subpoena(s) seems incredulous that no responsive records exist given that a litigation hold remains in place for *Stenstrom and Hoopes v Delaware County Board of Elections* still pending appeal before the Commonwealth Court of Pennsylvania (CD 876 2022):
  - a. Delaware County has certified that it holds no supporting evidence that would support any material facts that support Plaintiff’s complaint;
  - b. Plaintiff’s complaint and claims rely on material facts that Plaintiff’s attorney has yet to produce in support of its complaint, with Discovery having closed on October 2<sup>nd</sup>, 2023;
  - c. Plaintiff’s attorney has refused to respond to Defendants’ requests for Discovery;
  - d. Plaintiff’s attorney has refused to respond to Defendants’ requests for deposition;
  - e. Plaintiff’s attorney has refused to respond or Answer to any material facts presented by Defendants Stenstrom and Hoopes in their previous motions to dismiss, for summary judgment, to protect, to strike, to compel; and,
  - f. Plaintiff’s attorney has failed to meaningfully respond with specificity to any material fact and affirmative defenses presented by Defendants Stenstrom and Hoopes, and all entered into the record by Judge Erdos at the commencement of the June 20<sup>th</sup>, 2023, Discovery hearing.
13. Hence, with the close of discovery on October 2<sup>nd</sup>, 2023, the only documentation and material facts presented, and on the record, remain those provided by Defendants Stenstrom and Hoopes, none of which have been refuted by the Plaintiff or Plaintiff’s attorney, with

anything more than continued conjectural exclamations that they are “outrageous” and defamatory.

14. Plaintiff Savage, and Plaintiff’s attorney J. Conor Corcoran, have utterly failed to respond to requests for discovery from all Defendants, including Defendants Stenstrom and Hoopes, and have refused requests for depositions, which Defendants Stenstrom and Hoopes documented and memorialized for the record in their above-described Motion to Compel, and their Motion for Summary Judgement, to which Plaintiff and Plaintiff’s attorney, have failed to respond, or object to.
15. Plaintiff’s attorney, J. Conor Corcoran’s motions to deem admitted RFA’s and motion for sanctions are not responsive to Defendants Stenstrom’s and Hoopes motions, requests for discovery, request for deposition, or any other actionable statute within this Court’s jurisdiction or discretion to adjudicate.

### **REMEDY**

16. 231 Pa. Code § 4019 (Sanctions) paragraphs state as follows:
  - a. § 4019 (a)(1) The court may, on motion, make an appropriate order if
    - i. (viii) a party or person otherwise fails to make discovery or to obey an order of court respecting discovery.
  - b. § 4019 (c) The court, when acting under subdivision (a) of this rule, may make
    - i. (5) such order with regard to the failure to make discovery as is just.
17. As described and incorporated herein, Plaintiff Savage and Plaintiff’s attorney, J. Conor Corcoran, have failed to respect the Court’s Case Management Orders and extensions of discovery, make discovery, respond to subject Defendant's requests for discovery, or respond to Defendant’s timely motion to compel and motion for summary judgment.
18. Defendants Stenstrom and Hoopes have responded to Plaintiff’s motion to “Deem Requests for Admission” and motion for sanctions only out of an abundance of caution, and to ensure they “ring the bell” with a docketed response and objections to Plaintiff’s



motions which have been made without statutory citations or surface area for proper response, but nevertheless may be brought forward by Plaintiff in future appellate trajectories.

19. The Honorable Court has indulged Plaintiff Savage's and Plaintiff's attorney, J. Conor Corcoran's abuse of the Courts, and of Defendants Stenstrom and Hoopes, well beyond the limits of its jurisdiction to do so in light of Plaintiff's absolute failure to meet it's burden of production of any material facts to support its complaint and claim of defamation, or respond to or respect discovery and due process, or even acknowledge Defendants filings and responses.

WHEREFORE, Defendants Stenstrom and Hoopes respectfully request the Honorable Court GRANT the attached, proposed Order to Deny Plaintiff's subject motions, Dismiss Plaintiff's complaint with prejudice, and reserve Defendants rights to file for consolidated sanctions against Plaintiff and Plaintiff's attorney.

Respectfully submitted,



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LEAH HOOPES  
10OCT2023



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GREGORY STENSTROM  
10OCT2023

## **ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of the Plaintiff's Motion to Deem Requests for Admissions Admitted, and any response thereto, it is hereby ORDERED and DECREED that said Motion is DENIED.

Pursuant to Pa.R.C.P. 4019 (a)(1)(viii), it is ORDERED and DECREED that Defendants Stenstrom and Hoopes right to file consolidated Motion for Sanctions is GRANTED.

Pursuant to Pa.R.C.P. 4019(c)(5), it is further ORDERED and DECREED that the Plaintiff's Complaint is hereby dismissed with prejudice.

BY THE COURT:

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## VERIFICATION

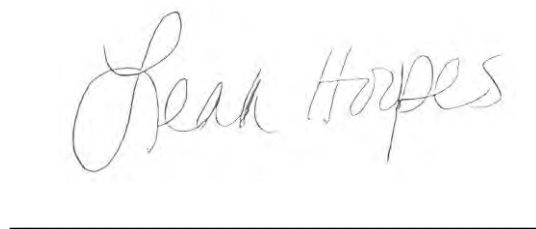
We, Gregory Stenstrom and Leah Hoopes, state that we are Pro Se Defendants in this matter and are authorized to make this Verification on its behalf. We hereby verify that the statements made in the foregoing Motion to Dismiss, and Answers to Plaintiff's Motion to Deem Admitted Requests for Admission and Plaintiff's Motion for Sanctions, are true and correct to the best of our knowledge, information, and belief. This verification is made subject to the penalties of 19 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



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GREGORY STENSTROM

PRO SE



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LEAH M. HOOPES

PRO SE

Dated: 10OCT2023

**Pro Se Defendants Gregory Stenstrom and Leah Hoopes**

**Gregory Stenstrom, Pro Se**

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Glen Mills, PA 19342  
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**DONALD J. TRUMP,**

et al,

Defendants

**CASE ID NO.: 211002495**

**MOTION TO COMPEL**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this date, they caused the foregoing Motion to Dismiss and Answers to Plaintiff's Motion to Deem Admitted Requests for Admission and Plaintiff's Motion for Sanctions, to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

/s/ Gregory Stenstrom and Leah Hoopes

Dated: 10OCT2023

# EXHIBIT A



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

SAVAGE VS TRUMP ETAL

: Court of Common Pleas  
:  
: \_\_\_\_\_ October Term, 21  
:  
: No. 02495

TO: Delaware County Solicitor William Martin  
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,  
or the Certificate of Compliance,  
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce  
Documents or Things Pursuant to Rule 4009.23**

I, William Martin  
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on SEPTEMBER 11<sup>th</sup> have been produced.  
(Date of Subpoena)

No documents or things responsive to this subpoena are in my possession.

Date: 10/2/2023

/s/ William Martin  
(Signature of Person Served with Subpoena)

# Ballard Spahr LLP

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Elizabeth Wingfield  
Tel 215.864.8128  
Fax 215.864.8999  
wingfield@ballardspahr.com

October 2, 2023

*By Hand Delivery and U.S. Mail*

Leah Hoopes  
241 Sulky Way  
Chadds Ford, PA 19317

Re: Subpoena to Produce Documents or Things Served Upon William Martin

Dear Ms. Hoopes:

Pursuant to the subpoena you served upon William Martin in *Savage v. Trump*, No. 02495, enclosed please find Mr. Martin's Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23.

Sincerely,

/s/ Elizabeth V. Wingfield  
Elizabeth V. Wingfield  
Enclosure