

## Letter/Motion for Discovery

(In Lieu of Formal/Coded Motion to be Delivered Within 24-28 Hours)

Docket #: 2:18-cv-12822

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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2019 JUN 25 P 1:13

Given now known also retaliation upon my retained attorney Lee Merritt Esq. who's having issues making appearance both discovery and his appearance on record must commence before entertaining any motions of dismissal and leaving my family unrepresented blatantly discriminates and leaves way for more threats and damages .

Given the submission of clear concise recordings illustrating criminal activity by both Lyndhurst Police and the home owners discovery must legally commence before any motions to dismiss are entertained for pursuit of justice for Shayling Kenworthy and our entire family..

Given also factors supporting the recordings

ie: Witness testimony from

Siabella Kenworthy

Mikailan Kenworthy

Jose Sang

Nelly Sang

John Sang

Jamie Sang

Shaylings immediate family surrounding witnessing Robert Martin threatening the Kenworthy family with his weapon firearm present and involved in the terroristic threats as well as Lyndhurst Police false arrest and terrorizing of the Kenworthy family in the weeks leading up to Shaylings murder the federal court must address especially given minors and the emotional mental trauma delays are causing the Kenworthy children's testimony depositions must commence immediately to bring closure and justice to our family in its entirety before any motions to dismiss and further delay allowed by opposition to subvert justice directly causing more undue mental emotional and psychological trauma damages upon our family

In discovery from Lyndhurst Police is the body camera footage of all encounters including the murder of Shayling Kenworthy and needs to be immediately made available before any motions to dismiss subverting justice for a life taken in the most heinous manner Possible is allowed causing further delay and expense to the federal court and our entire process as they have been for going now on 3 years ... 911 call records have Shayling Kenworthy alive answering the door fully exposing Lyndhurst Police reports as full fabrication and any motions to dismiss being entertained is an absolute affront to justice and equality under all terms of civil rights and code of law ...

With items evidence as well being cited and sought that will illustrate negligence blatant malice and intent to deliberately derelict duty to attack a family for protection of a home owners crimes with a badge. This evidence must be procured unless the federal court is a further extension to subvert justice and accountability

for criminal activity behind the badge which I hope and humbly hold out faith it is not ...

Ocean county sheriffs acknowledging on dash and body cameras narcon as negligence on narcon and its corporation for only informing them of its lethal effects on asthmatics after years on the market ...

911 calls Shayling Kenworthy alive illustrating Lyndhurst Police falsification of reports

Body cameras detective pizzuti acknowledges are logged in from the night his officers hagerty and Riena killed Shayling Kenworthy...

Body cameras from the false arrest that Robert Martin threatened us with if we did not do as we were being threatened to do ...

Siabella Kenworthy was interviewed and with Shayling when Lyndhurst Police followed thru on Roberts threats to our family which all of us myself Shayling and Siabella all told Lyndhurst Police we have a 45 minute recording of the homeowners threats for your officers and department...

Lyndhurst Police again lied on their report and stated they interviewed our son ...

For all these items of crucial evidence fully illustrating Lyndhurst Police departments and Robert martins crimes against the Kenworthy family leading to Shayling Kenworthys death it would be an absolute assault and affront on justice for Shayling Kenworthy and our family to entertain any motions to dismiss before full discovery is commenced

To not immediately order discovery would show intent upon the federal court and our entire system as a further mockery and weapon against the citizens seeking justice against police who are acting way outside any legal perimeters they have been granted for our protection. They are not for our persecution and brutalization for personal gain and enjoyment...

I humbly ask the court consider truly my arguments in pursuit for justice and closure for my family so we can begin to heal without the most vital piece of our family and future .... Shayling Kenworthy having justice and truth as the only narrative is paramount for our lives to continue in a healthy manner and we seek that closure via federal court as we have been since Shayling was taken from us to no avail as our previous attorney made it a point to sabotouge Justice for our family at every step including never commencing discovery for his colleagues benefit as can be fully illustrated via recordings of Brian Dratch fully threatening his clients when while not supplying interrogatories from opposing attorneys until a motion to dismiss was filed January 2018 after 3 months of asking Brian Dratch to send me the interrogatories via email all paper trails and recordings forensically intact ..

At no point would any opposition get on the phone or acknowledge my pro se status instead more bullying threats and retaliation against my children and family...

I ask that the federal court rein this circus in and bring it all to an immediate halt demanding accountability and rules of court procedure be followed and a status conference put on record wherein Siabella Kenworthy Mikailan Kenworthy be present and depositions commence immediately that day and this court case justice for Shayling Kenworthy our family be put on a proper course for closure and accountability for those parties still wishing absolution while they continue

inflicting harm upon us to skirt their unacceptable behavior that no one will applaud or side with ... Slumlords threats false arrest Lyndhurst Police dereliction of duty attacking a family please explain how and why this is taken 3 years and any one okay with helping then further delay and damage our entire country and process of fairness equality justice and laws ...

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Letter to court and our honorable judges to inform in lieu of formal coded motion should your honors given details feel that necessary as its fully evident it is in fact not me but opposition playing games misinforming the federal court as they continued trying to bully everyone involved or trying to become involved as illustrated... Thank you for your time should proper motion be needed please advise and it will be properly promptly submitted... I humbly thank your honors for all assistance in pursuit of justice for my beloved Shayling Kenworthy without further prejudices and undue retaliation and threats ... Thank you your honors for your utmost diligence with resolving this egregious affront to our judicial system and court proceedings... I look forward to your swift instillation of equality in future processes wherein my attorney and family is fully protected thru the rest of this trauma ...

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I seek a 2 month to undetermined time as we are truly at the will and mercy of the federal court and state of New Jersey for a continuation so my retained attorney Lee Merritt esq paid 5k in February and trying to come on since can and may formally make appearance in good standing once the retaliation his office is experiencing subsides hopefully with your honors assistance and he is given way to make said appearances without further inference or hindrance from the state of New Jersey to further deny his clients Shayling Kenworthy estate and family justice and the federal court must allow him to end the undue harm threats separations and retaliation that the Kenworthy family specifically and everyone who seeks to help from lawyers to reporters endure with regards to threats retaliation and pressure delays surrounding our case and civil rights...

No motions or timetables without Mr Merritt being allowed to come on record should be allowed causing prejudice and possible discrimination and dismissal due to lack of knowledge on my part pro se when especially when I've retained Mr Merritt who is being blocked retaliated against deliberately for taking on my family's wife's Shayling Kenworthy's estates case ...

Mr Lee Merritt is extremely busy and having taken on as many real callus heartbreaking tragedies causes and changes across the country with so many layers similar and absolutely different and disparaging like my families case wherein the community of police courts news social services networks truth be told as we must itsonus justice is not being sought or allowed making his time extremely valuable and very little as he's spread thin making every moment he dedicates precious and it should not be wasted or treated so cavalier by the federal court or any state his presence is needed in the most ... Mr. Merritt when we exchanged stories of retaliation he was utterly amazed at the details with regards to the retaliation my family and children are enduring to no avail and was appalled at the details of the next federal lawsuit filed against DCP&P the hospitals and law enforcement agencies who got tied up as a result of illegal unethical discrimination and defamatory tactics and illegal medical

practices and theft of honest services Medicaid medical fraud for gain with malice intent to harm by all parties against a widow victim of police brutality murder of Shayling Kenworthy and her children ...

I had to fly this past week down to Dallas to see Mr Merritt so we could have a meeting where I was told what I've known all along by a man I have enormous amounts of respect for he was being retaliated against and the state is playing games with him because of Shayling Kenworthys case and he's afraid that their interference may negatively effect the outcome of our proceedings... Mr Merritt and I agreed he was going to stay on the case and possibly handle the next and ill handle pro se informing the court what was happening which is new to both Mr Lee Merritt esq and myself and I am humbled to have such an honorable attorney who would keep it 100% with me and the court on and including things that are obviously negatively impacting their/his license and career to push forward for justice it's amazing the court system allows such behavior and such a lawyer and man exist ... I do see the people's lawyer/champion and the man I want representing my family... I ask the court bring this matter to an immediate end so we can proceed to trial and justice properly be served being represented as I'm legally allowed without prejudice for my beloved wife Shayling Kenworthy and pursuit of justice without future undue hindering or discrimination and retaliation extending to attorneys hired seeking justice as this is a blight on the system itself and a mockery to lives civil rights and what this court and country should stand for that is being lost in the deception of qualifying immunity fairness and equality in the eyes of any court when this is the result we all have witnessed .. My name has been on the docket for far too long now while all criminal parties have walked freely Shayling gone ...

I ask the federal judges humbly to address our obvious legal in-path and true unjust delay my attorney retained is experiencing and bring this to an immediate resolve so I am afforded the proper legal representation I actually paid for and am more than entitled to as this case moves forward in a non prejudiced manner again as it has been allowed in state filings with Brian Dratch's malicious misrepresentation of my families lives and all parties participating to subvert sweep justice for Shayling Kenworthy Dominican born American citizen under the rug ...

I so beyond appreciated Mr Merritt's time and finally meeting him in person and it's now on the court to end this delay that has been dragging since February which neither Mr. Merritt nor myself ever anticipated and I would have as he would have advised me put in motions for discovery among a few others ... Once Mr. Merritt is officially on record he has reason to dedicate his full time and resources to actually addressing the matters my case raises and actually be able to make an impact and difference!! I ask humbly that your honors assist and allow this representation commence immediately...

My family Shaylings life nor Mr. Merritt deserve the indifference and discrimination this court/opposition is continuing to show and allow by not allowing mr Merritt to make an appearance and my family finally have the proper representation we so do desperately obviously need when even he Lee Merritt is being retaliated against...

I ask your honors to please address these egregious violations of court procedures process and regulations so we may put on track justice without prejudice and continued undue harm and damages to the estate and family of Shayling Kenworthy Lee Kenworthy and now Mr Merritt esq and Firm and extended families as this has already been out of control!!!! Evidence from recordings to paper trails and full obvious facts prevalent can be provided by both myself and Lee Merritt esq so we humbly wait the courts actions to bring representation on record without future threats or delay ...

I thank your honors for making sure I am properly represented as Im entirely by law entitled to by procedural court rules and I ask my attorneys are properly treated fairly with the full respect dignity and diligence they deserve thruout this entire process going forward...