STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF RAMSEY	SECOND JUDICIAL DISTRICT
******	CASE TYPE: OTHER CIVIL
Savonte Kemp Vandassor, and Darliza Howse, Plaintiffs,	Court File No.:
Vs. Katrin Bachmeier, Kimberly Bukstein, Advocates for Civil Liberty (ACL) a 501c4 Non-Profit, Linda Underdall, and Home Care Watchdog, Defendants.	CIVIL COVER SHEET (NON-FAMILY CASE TYPE) Minn. R. Gen. Prac. 104
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This civil cover sheet must be filed by the initial filing lawyer or party, if unrepresented by legal counsel, unless the court orders all parties or their legal counsel to complete this form. Once the initial civil cover sheet is filed, opposing lawyers or unrepresented parties who have not already been ordered to complete this form may submit their own cover sheet within ten days after being served with the initial cover sheet. See Rule 104 of the General Rules of Practice for the District Courts.

If information is not known to the filing party at the time of filing, it shall be provided to the Court Administrator in writing by the filing party within seven (7) days of learning the information. Any party impleading additional parties shall provide the same information to the Court Administrator. The Court Administrator shall, upon receipt of the completed certificate, notify all parties or their lawyers, if represented by counsel, of the date of filing the action and the file number assigned.

## ATTORNEYS FOR PLAINTIFFS

Party: Savonte Vandassor and Darliza Howse

Date Case Filed: December 7, 2017

Attorneys: Shawn C. Reinke Victoria M.B. Taylor

## ATTORNEYS FOR DEFENDANTS

Party: Katrin Bachmeier

Attorneys: Timothy D. Webb Evan H. Weiner Attorney ID: 396676 0391454

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Neve Webb, Pllc 6800 France Ave. S. Suite 405

Edina, MN 55435 Tel: (952) 746 - 2400

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Party: Kimberley Bukstein

Advocates for Civil Liberty

Attorney: Self-Represented

1039 Barrett St. St. Paul, MN 55103 Tel: (651) 558 – 6864

Party: Linda Underdall Homecare Watchdog

Attorney: Unknown

Unknown address and Telephone

Note: If either Plaintiff or Defendant gets an attorney, the attorney's name, address, telephone number and attorney ID number must be given in writing to the Court Administrator immediately.

1. Provide a concise statement of the case including facts and legal basis: Plaintiffs contend Defendants conspired to defame them in order to secure Defendant Bachmeier an advantage in a pending custody dispute. Defendants made numerous reports to various government agencies (i.e., police, child protection) alleging false allegations against Plaintiffs. Plaintiffs seek judgment per Minnesota Statutes prohibiting malicious reporting and in defamation.

2.	Date Complaint was served: September 28, 2017 on Defendants Bachmeier, Bukstein, and Advocates for Civil Liberty. Defendants Underdall and Homecare	
	Watchdog have not been located.	
3.	For Expedited Litigation Track (ELT) Pilot Courts only:	
	a.   the parties jointly and voluntarily agree that this case shall be governed by the Special Rules for ELT Pilot. Date of agreement:	
	b.   The court is requested to consider excluding this case from ELT for the	
	following reasons:	
	Note: ELT is mandatory in certain cases, and where mandatory, exclusion may	
	also be sought by timely motion under the Special Rules for ELT Pilot.	
	c. Anticipated number of trial witnesses:	
	d. Amount of medical expenses to date:	
	e. Amount of lost wages to date:	
	f. Identify any known subrogation interests:	
4.	Estimated discovery completion within $\underline{6}$ months from the date of this form.	
5.	5. Discovery / Discovery of electronically stored information discussed with the other party?	
	✓ No □ Yes, date of discussion:	
	If yes, list agreements, plans, and disputes:	
6.	Proposed trial start date: <u>July 2018</u>	
7.	Estimated trial time: three days hours (estimates less than a day must be stated in hours).	
8.	Jury trial is:	
	☐ waived by consent of (specific party) pursuant to Minn. R. Civ. P. 38.02.	
	requested by <u>Plaintiffs</u> .	
9.	Physical/mental/blood examination pursuant to Minn. R. Civ. P. 35 is requested:	

☐ Yes ☑ No

- 10. Identify any party or witness who will require interpreter services, and describe the services needed (specifying language, and if known, particular dialect): None.
- 11. Issues in dispute: All claims and counterclaims.
- 12. Case Type/Category: 14 Other Civil
- 13. Recommended Alternative Dispute Resolution (ADR) mechanism: Mediation

Recommended ADR provider: JAMS

Recommended ADR completion date: March 2018

If applicable, reasons why ADR not appropriate for this case: N/A

By signing below, the attorney or party submitting this form certifies that the above information is true and correct.

Dated: December 7, 2017

Shawn C. Reinke, MN #396676

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ATTORNEYS FOR PLAINTIFFS

## **HEARING STATEMENT OF RIGHTS**

RIGHT TO A LAWYER: You have a right to have a lawyer represent you. You may hire a lawyer to represent you. You may also decide to represent yourself.

THERE IS NO ATTORNEY CLIENT RELATIONSHIP BETWEEN YOU AND THE COUNTY ATTORNEY OR COUNTY CHILD SUPPORT AGENCY. Employees of the County Attorney or Child Support Agency do not represent either parent, the custodian of the child or the child. The child support agency represents the public interest in cases involving public assistance and in other non public assistance IV-D cases. The goals of the child support agency may not be the same as yours.

**REASONABLE ACCOMMODATION:** If you ask in advance of the hearing, the court administrator can provide reasonable accommodations for a disability. Some examples of reasonable accommodations are: wheelchair access, an interpreter, Braille documents, large print materials, or audiotapes. If you need an accommodation, contact the court administrator as soon as possible. Contact the Dakota County Court Facilitator at 651-554-6206.

**TELEPHONE HEARING**: You may ask the court administrator to have the hearing be conducted by telephone. Because it is up to the child support magistrate to grant or deny the request, it is helpful that you make your request for a telephone hearing as soon as possible. Contact the Dakota County Court Facilitator at 651-554-6206.

HEARING PROCEDURE: This is a court hearing. The hearing will be held according to Minnesota Rules of General Practice 351 through 379, also called the "Expedited Child Support Process Rules." These rules are available at most Minnesota libraries and online at the Minnesota Supreme Court website, <a href="www.mncourts.gov">www.mncourts.gov</a>. The rules inform you how to obtain information before the hearing and how to obtain subpoenas. The rules inform you about the kinds of documents you need to bring to a hearing, your right to call witnesses and present evidence at the hearing along with details about how hearings are conducted. Hearings are generally open to the public.

**EVIDENCE:** Each party must bring to the hearing any witnesses and all written evidence the party intends to present. Each party must have enough copies for all other parties as well as for the court. If any party needs information to support or respond to the complaint or motion, that party should immediately notify the other party and make arrangements for exchange of information. The parties should cooperate in providing the requested information. There may be statutes, court rules or court orders that either permit or restrict release of information. Documents should be exchanged five (5) days before the hearing. Examples of documents that may be requested or needed for the hearing include pay stubs, W-2 forms, signed tax returns, bank statements, proof of medical insurance for dependents, medical and dental bills, child care expense statements from child care providers, written verification of other court-ordered support obligations for nonjoint children, voluntary payments made for the joint child, and other documents relating to income, assets and expenses. You may wish to consult an attorney if you have any questions regarding what documents to present or request.

SAFETY CONCERNS: If you have been threatened or harmed by the other party or if the children have been threatened or harmed by the other party, please contact the Dakota County Court Facilitator at 651-554-6206 about safety at the hearing itself. Please also inform the Dakota County Child Support Office about your concerns regarding safety and the safety of your children.