

Motion to Reopen Case

I respectfully request the reopening of the above-referenced case based on newly discovered evidence that was not available during the original proceedings.

I respectfully request the opportunity to present this new evidence before the court for reconsideration.

Thank you for your attention to this matter.

Copies were sent to the other parties

Sincerely,

Order Granting Motion to Reopen Case**

The court, having reviewed the motion filed by

Plaintiff to reopen the case based on newly discovered evidence and being fully advised in the premises, hereby orders :

Motion granted—

Motion denied—

DECLARATION

The Plaintiff, despite being blind and deaf, believes GUAM is both the best place and the worst for ADA compliance. Many buildings and sidewalks lack wheelchair access, and policies create severe hardships for the elderly and disabled, even though changing these policies would save the government money. Most of GUAM's power holders are related. The Plaintiff believes that agency directors related to Judge Gatewood complained about the Plaintiff, leading to Judge Gatewood's unreasonable and possibly illegal actions in dismissing all cases the Plaintiff filed to address serious ADA noncompliance. Verbal settlement agreements existed in these cases and required the cases to remain open in case of breach. Judge Gatewood dismissed and closed these cases without allowing the settlement terms to be entered, and labeled the Plaintiff as a vexatious litigant. Judge Gatewood also prohibits the Plaintiff from filing electronically, despite other district courts allowing fax or email. The Plaintiff requests that Judge Gatewood respond to these allegations. For years, the Plaintiff has walked miles to speak with agency directors who took extreme measures to avoid him. Every trip to the courthouse takes hours because of the lack of electronic filing. The Plaintiff has endured physical and vehicular assaults from government officials, yet Judge Gatewood refuses to review video evidence of these incidents.