

**PRO SE Defendants Gregory Stenstrom and Leah Hoopes**

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

**JAMES SAVAGE**  
Plaintiff,

v.

**DONALD J. TRUMP,**

and

**RUDOLPH W. GIULIANI,**

and

**DONALD J. TRUMP FOR  
PRESIDENT, INC.,**

and

**RUDOLPH W. GIULIANI, PLLC,**

and

**JENNA ELLIS,**

and

**GREGORY STENSTROM,**

and

**LEAH HOOPES,**

and

**PHILLIP KLINE,**

and

**THE THOMAS MORE SOCIETY,**

Defendants

**CASE ID NO.: 211002495**

**DEFENDANTS ANSWER AND  
MEMORANDUM IN SUPPORT  
IN RESPONSE TO  
PLAINTIFF AND PLAINTIFF'S  
ATTORNEY'S MOTION FOR  
PROTECTIVE ORDER**

**ORAL ARGUMENTS  
REQUESTED**

**DEFENDANTS STENSTROM AND HOOPES  
ANSWER AND MEMORANDUM IN SUPPORT  
OF RESPONSE TO PLAINTIFF AND PLAINTIFF’S ATTORNEY’S  
MOTION FOR PROTECTIVE ORDER**

1. Answering Defendants object to the entirety of the subject Plaintiff and Plaintiff’s Attorney Motion for Protective Order.
2. Defendants Stenstrom and Hoopes were exercising their constitutionally protected First (1st) Amendment rights, for which Plaintiff has filed abusive complaints against the same Defendants in multiple jurisdictions, and multiple separate complaints (since joined), in this Honorable Court, with claims of defamation, malice, and conspiracy.
3. Plaintiff’s vexatious use of frivolous litigation, abuse of legal process, and false representations by Plaintiff’s Attorney, have brought fraud upon the court.
4. Plaintiff’s protective motion is unconscionable as there are no undisputed, genuine facts that support the alleged “danger” Plaintiff and Plaintiff’s attorney claims.
5. The balance of hardship would prejudice answering Defendants, depriving them of their guaranteed, secured, and protected rights to keep and bear arms pursuant to the US Constitution, Second (2nd) Amendment, and the Constitution of the Commonwealth of Pennsylvania Article I, Section 21.
6. Further, Masons Manual of Legislative Procedures, Chapter 2, Section 7, declares constitutional provisions stand on a higher plane than statutes and are mandatory.
7. This maxim of American Law supersedes unfounded accusations that have not been adjudicated by a trier of fact, but are mere conjecture and color of law accusations without reference to any statute, or provision of law, that Defendants have supposedly violated.
8. Finally, Defendants Stenstrom and Hoopes are individually people of the Commonwealth of Pennsylvania and are protected by mandatory language “**shall not be infringed**” and “**shall not be questioned**” pursuant to federal and state constitutions.
9. Defendants Stenstrom and Hoopes move that this Honorable Court deny the entirety of Plaintiff’s Motion for Protective order, because of the primary authority stated above that cannot be superseded by disingenuous accusations.

## MEMORANDUM IN SUPPORT OF DEFENDANTS ANSWER

1. Defendants have made no statements regarding violence or made any communications aside from litigative responses and service of legal filings, against Plaintiff, Plaintiff's attorney Corcoran, or the Honorable Court, for which Plaintiff has not provided any factual proof of any such statements exhorting violence or incendiary threats by answering Defendants, beyond conjectural contrivances.
2. Plaintiff attorney has grossly conflated Defendant Stenstrom's quote from well-known US Statesman, leader in the movement for the abolition of slavery, and great American historical figure, Frederick Douglass, regarding the means of changing the United States being found on the "*soap box, the ballot box, the jury box, and the powder box,*" as an advocacy for violence.
3. Defendant Stenstrom has repeatedly, and clearly stated that the "way home" through the controversy of fraudulent elections is through the law, the courts, and "*the jury box,*" so that our nation can avoid violence and "*the powder box.*"
4. Plaintiff's attorney Corcoran's false inferences, utterances, and conflation of these statements, as a licensed attorney and officer of the court, that Defendant Stenstrom implied the endorsement of the use of "explosives" and "incendiary devices" against the Plaintiff, Plaintiff's attorney, and the Honorable Court, transcends the bounds of common sense and absurdity, and is an affront to this Court.
5. Defendant Stenstrom is a 22-year career naval officer, veteran of foreign wars, and graduate of the US Naval Academy; Leah Hoopes holds dual Associate Degrees and was a medical professional; with both Defendants being successful small business owners, and parents. Their public statements and writing correspondingly reflects their educations and experience, with regular references to historical figures and events, famous quotes, literature, books, history, personal anecdotes, and a mutual commitment to resolving

matters of great public concern civilly, and lawfully. Their multiple Pro Se lawsuits, co-authored book, “The Parallel Election,” and advocacy for lawful activism is proof of this.

6. Defendants Stenstrom and Hoopes notified law enforcement officials of Plaintiff Savage’s civil and criminal violations of law on November 7th, 2020. These officials included US Attorney William McSwain, Pennsylvania Attorney General Josh Shapiro, and Delaware County District Attorney Jack Stollsteimer. These violations were subsequently, and immediately, referred to the highest levels of the US Department of Justice. (See Exhibit A).
7. Defendants Stenstrom and Hoopes Exhibit B, is a compilation of several US DOJ FOIA responses regarding the November 2020 election that include dozens of email exchanges regarding Defendants Stenstrom's and Hoopes' sworn declarations, affidavits, eyewitness testimony, injunctive court order, and evidence, between executive level DOJ officials including US Attorney General Barr, US Attorney General Chief of Staff, US Attorney General Senior Counsel, former US Attorney for Eastern PA William McSwain, all 94 US Attorneys, multiple States Attorney Generals, the Director of US Public Integrity Section (PIN), and Directors of the FBI and multiple other US federal government agencies subsequent to the November 2020 elections. Not a single comment is made in any of the correspondence by these executive and senior justice officials, most being learned attorneys, that would imply Defendants Stenstrom and Hoopes statements, testimony and evidence regarding Plaintiff Savage might be false, unworthy of investigation, or otherwise “frivolous,” as characterized by Plaintiff’s attorney Corcoran.
8. These email exchanges directly refer to, in great detail, Plaintiff Savage’s illicit possession of USB vCards, his insertion of these vDrives into voting tabulation servers, and corroborate Defendants Stenstrom and Hoopes sworn, eyewitness testimony and factual assertions regarding the conduct of elections in Delaware County, PA, in the November 2020 general election, and factual statements regarding Plaintiff Savage, a public official.

9. As repeatedly stated in answering Defendants Stenstrom's and Hoopes' previous motions, and specifically their Motion to Dismiss, and Motion for Summary Judgement, (both denied by this Court without requested oral arguments), this makes Defendants Stenstrom and Hoopes both prospective federal and state witnesses to criminal violations of law (by the Plaintiff) in still pending investigations and yet to be adjudicated litigation currently in the active trajectory of the Appellate court (*Stenstrom & Hoopes v Boockvar, et al, Commonwealth Court of Pennsylvania, Case No. 876 and 877 CD 2022*), which were facts well known by Plaintiff and Plaintiff's attorney prior to filing their complaints, and have been made known to this Honorable Court.
10. Former US Attorney for Eastern Pennsylvania, and 2022 gubernatorial candidate, William McSwain's June 9<sup>th</sup>, 2021, public letter to President (Defendant) Trump (Exhibit C), further corroborates the factual statements of Defendants Stenstrom and Hoopes, and summarizes much of the heavily redacted correspondence included in Exhibit B, which is proof that the veracity of Defendants Stenstrom and Hoopes statements and evidence was never in question, or diminished by US Attorney General Barr's and Pennsylvania Attorney General Shapiro's politically driven refusals to investigate.
11. Nor was the fact that more than 64 notable 2020 election fraud cases being dismissed diminishing of Defendants' statements of fact and evidence, as 20 of those cases were dismissed without evidentiary hearings or oral arguments, none permitted the entry of evidence that was contradictory to the mainstream media narrative of "the safest and most secure election in history," and not a single case was permitted a trial where evidence could be weighed in the crucible of a court with opposing counsel and a jury of citizens.
12. Defendants Stenstrom's and Hoopes' Exhibit D is a heavily redacted USPS investigative report obtained through FOIA, and published by "*The American Thinker*," that states that PA mail in ballots, were brought into Pennsylvania, over multiple state borders. The contractor that printed 200,000 bound for Chester County, PA; 650,000 bound for Philadelphia; and hundreds of thousands more destined for other Counties in Pennsylvania in the November 2020 election, could not recall whether the ballots were shipped by

contract courier or USPS. A truck shipment of mail and ballots was, indeed, unaccounted for. The report's otherwise inconclusive findings regarding the specificity of contract truck driver Jessie Morgan's allegations are strongly diminished by the fact that it does not mention the substantial unlikelihood that fraudulent mail in ballots with false declarations (signatures) would be recorded by USPS mail scanners, with other conjectural statements made as declarations unsubstantiated by the actual evidence that hundreds of thousands of mail in ballots were unaccounted for.

13. This USPS report corroborates Defendants Stenstrom and Hoopes eyewitness accounts that they observed 130,000 presumably fake mail in ballots being processed in the Delaware County, PA centralized counting center ("The Wharf"), and further corroborates answering Defendants eyewitness testimony that they observed 70,000 unopened "real" mail in ballots in a sequestered storage room after they secured an injunction to access that room, that were never counted.
14. In fact, opposing Delaware County attorneys to Stenstrom and Hoopes, inadvertently submitted photographs in their own litigative responses that required them to admit to the undisputed fact that thousands of unopened mail in ballot remained uncouncted in sequestered back office rooms in Delaware County in *Stenstrom and Hoopes v Delaware County Board of Elections (US Supreme Court Case No. 22-503)*, of which Stenstrom's and Hoopes's *Writ of Certiorari* and *Request for Reconsideration* were denied by the US Supreme Court without opinion, and for which all lower Courts also denied evidentiary hearings, oral arguments - or trial - which was the sole requested relief by Stenstrom and Hoopes – to hear their evidence before a trier of fact, before a jury of their peers.
15. Plaintiff Savage, as a public official; former President of the United Steel Workers of Philadelphia; Vice Chair of the Delaware County Democratic Party; and Delaware County Voting Machine Warehouse Supervisor; had full supervisory control and custodial accountability for over 1,000 voting machines and their respective election software and vDrives, ballot scanners, ballots, and election materials, which is a factual matter of public

record, Court records, and filings by both Plaintiff and Defendants in the subject case before the Court.

16. Yet, Plaintiff and Plaintiff's attorney continue to aver both in their subject motion, and previous filings, that Plaintiff Savage was NOT a public official beholden to Defendants Stenstrom's and Hoopes' 1<sup>st</sup> Amendment freedom of speech as ascribed in the US Supreme Court's ruling in *New York Times Co. v. Sullivan*, 376 U.S. 254, 286 (1964).
17. Defendants Stenstrom and Hoopes respondent Answer to Plaintiff's Complaint of May 23rd, 2022, included both Defendants Objections AND New Matter Affirmative Defenses. Contrary to Plaintiff's attorney affirmations in the subject Motion, he did not respond to those New Matter Affirmative defenses until April 28th, 2023, almost a year after Defendant response. Plaintiff's curative procedural response was not only untimely and impermissible by law, but also non-compliant with Rules of Civil Procedure, yet inexplicably, was administratively permitted to be submitted by this Honorable Court's Discovery court to the docket, separate from Motions court, and denying Defendant's Motion to Strike in the process.
18. Plaintiff's attorney consistently misrepresents to the Court that Defendants Stenstrom and Hoopes have not responded to Plaintiff's "factual allegations," when, in fact, Defendants have repeatedly stated in their motions that Plaintiff has made no factual allegations at all besides impermissible conjecture, and has not presented any triable issues or facts to the Court in support of its defamation, malice, and civil conspiracy counts.
19. The exhibit Plaintiff's attorney has entered in this filing, and its other most recent filings, as its sole "factual allegation" is both impermissible and intentionally mislabeled to fit its disingenuous narrative. The photograph, whose origin is omitted or undocumented aside from Plaintiff's attorney unfounded personal attestations that it depicts Defendant Stenstrom sleeping through the entirety of the 2020 election is, in fact, a photograph pulled from Facebook of Defendant Stenstrom during a short 4am-5am (0400-0500) break, during the 24 hours (0700-to-0700) from November 8th-through-9th, 2023, when he was present

as an Authorized Representative in the Delaware County Wharf central counting center observing the processing of ballots. Stenstrom had been relieved from his watch by another Authorized Representative.

20. Hence, the sole offering of “evidence” offered by Plaintiff’s attorney since his October 31<sup>st</sup>, 2021, filing of the underlying complaint is a singular mislabeled and misrepresented photograph from the November 2022 election, (not the 2020 election), pulled from Facebook by Plaintiff’s attorney without a moment to spare, and presented after the Case Management Ordered discovery deadline, upon which hinges the Plaintiff’s entire claim that Defendants Stenstrom and Hoopes recounting of events, declarations, affidavits, videos, audios, photographs, emails, texts, official Return Board report that the November 2020 election could not be reconciled by tens of thousands of votes, their book “The Parallel Election,” DOJ FOIA responses, RTK responses, USPS Investigation report, US Attorney General McSwain’s emails and public letter; and that Plaintiff Savage was essentially an anonymous, private person presiding as chief primary custodian of all election machines and materials in Delaware County, PA, for the November 2020 election are all a “scandalous” fiction in a diabolical conspiracy by Defendants President Donald Trump, Mayor Rudy Guiliani, former Kansas Attorney General Phil Kline, attorney Jenna Ellis, the Thomas More Society, Leah Hoopes and Gregory Stenstrom to defame Plaintiff Savage.
21. Regarding Plaintiff’s attorney’s false and inflammatory statements that Defendants Stenstrom and Hoopes are anti-gay, and advocates for violence against gay people, Plaintiff’s attorney circuitously justified this unfounded accusation based on Defendants Stenstrom and Hoopes factual statements in previous motions that Plaintiff’s attorney Corcoran subverted special Covid-19 procedures to divert the trajectory of the case from the Philadelphia Court of Common Pleas Motions Court to Discovery Court, in an attempt to receive favorable extension of discovery deadlines that had been denied to the Plaintiff’s attorney Corcoran in Motion’s Court.



22. Defendants made note that Plaintiff had used similar procedural chicanery in other cases, as in this case, to circumvent rules of civil procedures, and received inexplicable and otherwise implausible special attention and favor from the special Discovery Court procedures, and administrative staff, clerks and judges associated with the special Covid 19 procedures.
23. Defendants remarked that a plausible reason for this special treatment was that Plaintiff's attorney Corcoran, and Judge Anders, the presiding judge for the Discovery Court, both shared well known, public gay activism as a potentially unifying causation for special treatment.
24. Plaintiff was permitted to contrive, file, and perfect a new complaint against Defendant President Trump, consolidate that case with this subject case, and obtain favorable extraordinary relief and case extension for the entire (new) consolidated cases that had been previously denied to him in the Motions Court, all within a matter of hours of filing said petitions and motions, within the venue of Discovery court (and its affinity group), while Defendant's Motions and filings have languished in excess of 30 days, unanswered. Plaintiff's attorney has similarly benefited and enjoyed filings submitted long after normal business hours of the court being processed and entered into the docket after hours, in the dead of night, by senior Discovery Court personnel.
25. Now, Plaintiff's attorney Corcoran, is somehow afraid for his life, and demanding the Honorable Court confiscate Defendant's firearms, muzzle them from speaking, restrict their movements, restrict their communications, restrict their rights as Pro Se litigants to defend themselves by filing legal documents with the Court, and sanction them for \$15,000, for having the temerity to question the decidedly poor optics that Plaintiff's attorney Corcoran, himself, fomented, and upon which he rests his professional reputation.
26. Regarding Plaintiff's attorney citation of *Pa.R.C.P. 4012* as providing remedy for the extraordinary relief he demands described above, *4012* is the procedural statute regarding

discovery, which makes no such provision of allowances that would provide any Court juris to provide the relief sought.

27. Defendants Stenstrom and Hoopes have an indisputable right to vigorously defend themselves Pro Se, a right that consistently bridles Plaintiff's attorney, who has frequently referred to answering Defendants filings as "gibberish" among other denigrations, including Plaintiff attorney Corcoran's motions to prevent Pro Se Defendants Stenstrom and Hoopes from submitting filings without permission from the Honorable Court to do so, for the presumed reason, which he leaves unsaid for the Court to figure out, of apparently upsetting him.

28. Defendants are one of the people as submitted in their respective Declarations of Status (see Exhibit E)

10. Hence, Defendants Stenstrom and Hoopes move that this Honorable Court deny the entirety of Plaintiff's Motion for Protective order, for reason that the primary authority stated above cannot be superseded by disingenuous accusations.

Respectfully submitted,



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**Date:** 14JUNE2023

## 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 for Summary Judgement 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: 14JUNE2023

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

**JAMES SAVAGE**

Plaintiff,

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**DONALD J. TRUMP,**

and

**RUDOLPH W. GIULIANI,**

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**DONALD J. TRUMP FOR  
PRESIDENT, INC.,**

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**RUDOLPH W. GIULIANI, PLLC,**

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**JENNA ELLIS,**

and

**GREGORY STENSTROM,**

and

**LEAH HOOPES,**

and

**PHILLIP KLINE,**

and

**THE THOMAS MORE SOCIETY,**

Defendants

**CASE ID NO.: 211002495**

**CERTIFICATE OF SERVICE**

**FOR**

**DEFENDANTS ANSWER AND  
MEMORANDUM IN SUPPORT  
IN RESPONSE TO  
PLAINTIFF AND PLAINTIFF'S  
ATTORNEY'S MOTION FOR  
PROTECTIVE ORDER**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of Defendants Stenstrom and Hoopes DEFENDANTS ANSWER AND MEMORANDUM IN SUPPORT IN RESPONSE TO PLAINTIFF AND PLAINTIFF'S ATTORNEY'S MOTION FOR PROTECTIVE ORDER was served upon all parties at the addressees below on the date indicated below:

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Counsels for Defendant Jenna Ellis

A handwritten signature in black ink that reads "Gregory Stenstrom". The signature is written in a cursive style with a large, stylized "G" and "S".

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GREGORY STENSTROM  
PRO SE

A handwritten signature in black ink that reads "Leah Hoopes". The signature is written in a cursive style with a large, stylized "L" and "H".

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LEAH M. HOOPES  
PRO SE

Dated: 14JUNE2023