
James Savage,

Plaintiff,

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

OCTOBER TERM, 2021
No. 2495

v.

Donald J. Trump, et. al.,

Defendants.

ORDER

AND NOW, this _____ day of _____, 2023, upon consideration of the Plaintiff's Motion for a Protective Order, and any response thereto, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**; and,

Defendants Gregory Stenstrom and Leah Hoopes are hereby **ORDERED** as follows: they shall not make any further public statements about the Plaintiff; Plaintiff's counsel; any judge, party and/or witness in the above captioned matter; the merits of any claim or defense in the above captioned matter; and/or are absolutely forbidden from using, or making any direct or indirect threats of the use of, any firearms, explosives, a powder box, violence, or any allusions thereto whatsoever; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall refrain from any direct or indirect contact with the Plaintiff or Plaintiff's counsel via any form of telephone, electronic, written and/or or postal correspondence, save for the exchange of any discovery material via e-mail, and/or filings via the Court's e-filing system; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall surrender any and all weapons and/or incendiary material and/or devices in their possession to the Sheriff of either Philadelphia or Delaware County, bearing any and all costs therefor, and are otherwise forbidden from possessing any weapons and/or incendiary material or devices until both the conclusion of the above captioned matter, and upon further application to this Court; and,

It is further **ORDERED** that Defendants Gregory Stenstrom and Leah Hoopes shall stay away from the Plaintiff, Plaintiff's counsel, and any judge, party and/or witness in the above captioned matter, at a distance of no less than one (1) mile at any and all times, until both the conclusion of the above captioned matter, and upon further application to and/or Order of this Court; and,

Defendants Gregory Stenstrom and Leah Hoopes are hereby **SANCTIONED** and **ORDERED** to pay attorney's fees in the amount of \$15,000 (Fifteen Thousand Dollars) pursuant to 42 Pa.C.S.A. § 2503 within the next thirty (30) days; and,

It is hereby **ORDERED** and **DECREED** that any violation of the terms of this Order shall result in a hearing for civil contempt, upon further application to this Court.

BY THE COURT:

J.

Program Type: Major Jury
Discovery Ends: August 7, 2023

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
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RULE TO SHOW CAUSE

And now, this _____ day of _____, 2023, a rule is hereby issued upon Defendants Gregory Stenstrom and Leah Hoopes to show cause why the attached Order should not be entered against them.

A hearing regarding the same shall be held on _____, 2023, at _____ .m., in City Hall _____ and/or via virtual hearing on Zoom, per future Order of the Court.

BY THE COURT:

J.

Case ID: 211002495
Control No.: 23061340

LAW OFFICE OF J. CONOR CORCORAN, P.C.

J. Conor Corcoran, Esquire

Identification No. 89111

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Philadelphia, PA 19130

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Attorney for Plaintiff

James Savage,

Plaintiff,

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION**

OCTOBER TERM, 2021

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Donald J. Trump, et. al.,

Defendants.

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Plaintiff, by and through his undersigned counsel, the Law Office of J. Conor Corcoran, P.C., respectfully submits this Motion for a Protective Order, and in support thereof avers as follows:

1. The above captioned matter concerns *inter alia* defamation injuries inflicted by Defendants Gregory Stenstrom and Leah Hoopes, beginning on or about November 25, 2020, and a true and correct copy of the pending Complaint is attached hereto and incorporated herein as Exhibit A.
2. As reflected on the docket, Defendants Stenstrom and Hoopes filed their Answer to the Plaintiff's Complaint on May 23, 2022, and said Defendants subsequently discharged their attorney, Thomas J. Carroll, whereupon this Honorable Court entered an Order on October 31, 2022 (docketed November 9, 2022) allowing said Defendants to proceed *pro se* in the above captioned matter.
3. Since the entry of that Order, Defendants Stenstrom and Hoopes have engaged in a repeated pattern of threatening to use explosives against this Honorable Court and/or the Plaintiff and/or the Plaintiff's undersigned counsel, in order to achieve their litigation and/or political

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objectives in the above captioned matter, culminating with said Defendants most recent claims that undersigned counsel and the Honorable Daniel Anders are conspiring, as gay activists, to manipulate the proceedings in the above captioned matter, as further set forth *infra* at length.

4. On December 2, 2022, Defendant Stenstrom published a statement on his personal blog¹, announcing his intentions as follows:

“The Constitution provides three ways to change our Republic, the jury box, the ballot box, and the powder box.

If we don’t fight in the jury box to protect our ballot box, our families, loved ones, and friends will have to suffer the pain of the powder box.”

A full and complete transcript of Defendant Stenstrom’s remarks in this regard, and others as set forth *infra*, is attached hereto and incorporated herein as Exhibit B.

5. On December 7, 2022, Defendant Stenstrom published the following statement on his personal blog², summarizing an interview Defendants Stenstrom and Hoopes conducted with Steve Bannon on Friday, December 2, 2022 (and providing a copy of the video thereof), to wit:

“Our second appearance on Friday, 02Dec on Steve Bannon’s ‘War Room’ was a bit meatier than our first abbreviated appearance on Wednesday, 30Dec, and included a report on the situation in Brazil, which is where we may be heading if we can’t sort this out in our Courts. Our goal is to keep this in the realm of the jury box, to solve the problems with the ballot box, and not have to resort to the powder box. Stay in the fight.”

Video transcript:

(00:00) Steve Bannon: “Greg Stenstrom and Leah Hoopes and we’ve had them on a number of times, guys we’re gonna have about ten minutes, I just want you to take us through, you guys take it walk through what the book is about but particularly what you found about the corruption in the stealing of the election in 2020 in Delaware County...(3:26)...Brazil’s on the brink essentially about the machines...when you say on a mass basis, they substitute votes for the ballots they created, number one walk me through how they substituted it and then number two how they actually created their own ballots. Greg, why don’t you do that, just tell me how they substituted it, and how they created their own.”

(03:54) Gregory Stenstrom: **“First of all, this is grand mal corruption that’s centrally controlled, and it is a national conspiracy, and it’s highly targeted. They target specific counties. 32 counties control basically at a mass level the**

¹ <https://patriot.online/@gregorystenstrom/posts/AQDXESoTTcwANHMYYy>

² <https://patriot.online/notice/AQMGjoRrlmDPhQ7oQa>

3200 other counties in the country. **At that level what they do is they bring in hundreds of thousands, millions of fake ballots that they create from actual voter rolls, which they then scrub...**and then what they did in the central counting centers, which you saw everywhere – Antrim, Philadelphia, Delaware County, DeKalb County, Fulton County – then they don't let you get near the ballots. The reason they do that is because they can't let you see them. **They run them through the machines and once that ballot comes out of an envelope, it's a fired bullet.** (05:02.)”

See Exhibit B.

6. On March 14, 2023, Defendant Stenstrom made his most recent confession of considering the use of explosives, during Defendants Stenstrom and Hoopes' mutual appearance on an interview with Roger Stone³, whereupon Defendant Gregory Stenstrom agreed to the suggestion that he had no confidence in the judicial system, and that a solution to that problem was the employment of explosives, to wit:

(35:05) Roger Stone: “So I guess here is the question cause obviously you paint a very draconian picture, certainly a downbeat interview in terms of the inherent corruption and unfairness of the system. We know we were raised to believe that the judicial branch of the government was non-political, that it was fair, that it was based on equal justice, that the purpose of the courts were to get to and to and underline the truth, **but as you and I agreed this weekend, neither one of us has much confidence in the judicial system. You presented an open and shut case, you've documented everything you've said here today, yet it particularly authorities in the states of Pennsylvania who had a legal requirement to conduct an investigation and take action and have done nothing whatsoever, Greg what's the solution? Is there a solution? Other than prayer?**”

Gregory Stenstrom: “**Well there is, there is a solution.** I think one of the reasons you and I hit it off when we met, and also you mentioned President Trump, the magic of President Trump and the experience you brought to elections, and what bonds Leah and myself, is that we're in the voting business, we're in the citizenry business, we're in the republic business. **We want – you know, you can conver – you can change the country from the soap box, the ballot box, the jury box, and the powder box (explosive enumeration with fingers)** and what we've been involved in is hearts and minds, voters, the misanthropes...(whereupon he goes into his ant analogy attacking one another in a jar)...we identify the misanthropes, you already identified them in your book about Bush, and then we go after the legislation that gave them the power to do

³ <https://frankspeech.com/video/stonezone-gregory-stenstrom-leah-hoopes-authors-parallel-election>

this, and then we're gonna find our way home, and that's just the starting point. That's the close on that question."

See Exhibit B.

7. Finally, on May 17, 2023, Defendants Stenstrom and Hoopes appeared in a video interview on the CannCon podcast⁴, whereupon Defendant Stenstrom said that undersigned counsel for the Plaintiff was conspiring with the Honorable Daniel Anders of the Court of Common Pleas of Philadelphia County, as homosexual activists, in order to manipulate the proceedings in the above captioned matter, and compared undersigned counsel and Judge Anders to drag queen performers who expose themselves to children, and deserving of being attacked, to wit:

(01:31:03) Gregory Stenstrom: "Now if we only have time to talk about the election, we focus on that. But the bigger picture, Brian, and Leah was talking about it, is **these people are taking over the country one thing at a time**. Now I can't, I can't even say the word transgender. You know, we used to, you know, I can't even say anything. Well I do, I don't care. **I can't say anything in our lawsuit, we, you know we had a problem with, uh, you know we had a problem with uh what looks like a, like a group of you know gay um activists who are in the, in the court. And we just said, hey, look it. You know, the judge, the lawyer that's suing us is the first gay divorce attorney in the country, and the judge he's putting everything to is the first gay judge openly gay judge in Philadelphia. So I said well we're sitting here in one part of the court, we're going through the motions, and all of a sudden this guy shifts it over you know to this venue in the court. So what happens is, people are afraid to say anything...they're afraid of saying the obvious. It's like you know like these drag queens in in in elementary schools. People are afraid of saying why is that freak show you know waiving his ass, and doing the most lewd things in front of children, and no one is tackling him.** And everyone is oh geez you know we can't say anything. We can't say anything about the election, I don't want to be an election denier, I don't want to say anything about transgender, I don't want to say anything about potentially offending somebody about gay rights...(1:34:21) This is what we're dealing with. And if we don't start addressing these things – take care of your health, get your tests from Immunoprofile(.com), you know go to Patriot.Online, donate to us, learn you know it's a great social media platform, go to the ParallelElection.com, buy the book..."

See Exhibit B.

⁴ <https://rumble.com/v2od4t2-live-at-9pm-with-greg-stenstrom-and-leah-hoopes-on-their-active-pa-2020-law.html>

8. Some and/or all of these suggestions of violence, as set forth *supra*, have been stated or promoted by Defendants Stenstrom and/or Hoopes in the pursuit of selling their self published book about the above captioned matter and the 2020 election, entitled The Parallel Election⁵.

9. Pa.R.C.P. 4012 provides that the Plaintiff may request a protective order from the Court, such as that being requested herein, as “justice requires to protect a party or person from unreasonable annoyance...oppression, burden, or expense” and which is warranted by the aforementioned statements and publications from Defendants Stenstrom and Hoopes, suggesting as they do the employment of explosives to achieve their litigious and political goals, specifically identifying undersigned counsel, and the Hon. Daniel Anders, as conspiratorial gay activists who are deserving of violent repercussions.


10. 42 Pa.C.S.A. § 2503 provides that attorney’s fees may be awarded where, as here, Defendants Stenstrom and Hoopes have engaged in dilatory, obdurate or vexatious conduct during the pendency of a matter, and the aforementioned actions of Defendants Stenstrom and Hoopes have consequently preoccupied in excess of thirty (30) hours of undersigned counsel’s time, including but not limited to filing reports with the Federal Bureau of Investigation, and the Attorney General’s Office.

WHEREFORE, Plaintiff respectfully requests entry of the attached Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: June 6, 2023



J. Conor Corcoran, Esquire
2601 Pennsylvania Avenue
Suite 501
Philadelphia, PA 19130
Phone: (215) 735-1135
Fax: (215) 735-1175
Email: conor@jccesq.com

⁵ See The Parallel Election, © 2022 by Gregory Stenstrom and Leah Hoopes, published by Interrita Publishing, ISBN Nos. 978-1-958682-29-6, 978-1-958682-28-9, and 978-1-958682-27-2.

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**PLAINTIFF'S BRIEF IN SUPPORT OF
MOTION FOR A PROTECTIVE ORDER**

I. Matter Before The Court

The Plaintiff's Motion for a Protective Order.

II. Question Presented

Should the Motion for a Protective Order be granted? Suggested answer: yes.

III. Facts

The above captioned matter concerns *inter alia* defamation injuries inflicted by Defendants Gregory Stenstrom and Leah Hoopes, beginning on or about November 25, 2020, and a true and correct copy of the pending Complaint is attached hereto and incorporated herein as Exhibit A.

As reflected on the docket, Defendants Stenstrom and Hoopes filed their Answer to the Plaintiff's Complaint on May 23, 2022, and said Defendants subsequently discharged their

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attorney, Thomas J. Carroll, whereupon this Honorable Court entered an Order on October 31, 2022 (docketed November 9, 2022) allowing said Defendants to proceed *pro se* in the above captioned matter.

Since the entry of that Order, Defendants Stenstrom and Hoopes have engaged in a repeated pattern of threatening to use explosives against this Honorable Court and/or the Plaintiff and/or the Plaintiff's undersigned counsel, in order to achieve their litigation and/or political objectives in the above captioned matter, culminating with said Defendants most recent claims that undersigned counsel and the Honorable Daniel Anders are conspiring, as gay activists, to manipulate the proceedings in the above captioned matter, as further set forth *infra* at length.

On December 2, 2022, Defendant Stenstrom published a statement on his personal blog⁶, announcing his intentions as follows:

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IV. Argument

Pa.R.C.P. 4012 provides that the Plaintiff may request a protective order from the Court, such as that being requested herein, as "justice requires to protect a party or person from unreasonable annoyance...oppression, burden, or expense" and which is warranted by the aforementioned statements and publications from Defendants Stenstrom and Hoopes, suggesting as they do the employment of explosives to achieve their litigious and political goals, specifically identifying undersigned counsel, and the Hon. Daniel Anders, as conspiratorial gay activists who are deserving of violent repercussions.

42 Pa.C.S.A. § 2503 provides that attorney's fees may be awarded where, as here, Defendants Stenstrom and Hoopes have engaged in dilatory, obdurate or vexatious conduct during the pendency of a matter, and the aforementioned actions of Defendants Stenstrom and Hoopes have consequently preoccupied in excess of thirty (30) hours of undersigned counsel's time, including but not limited to filing reports with the Federal Bureau of Investigation, and the Attorney General's Office.

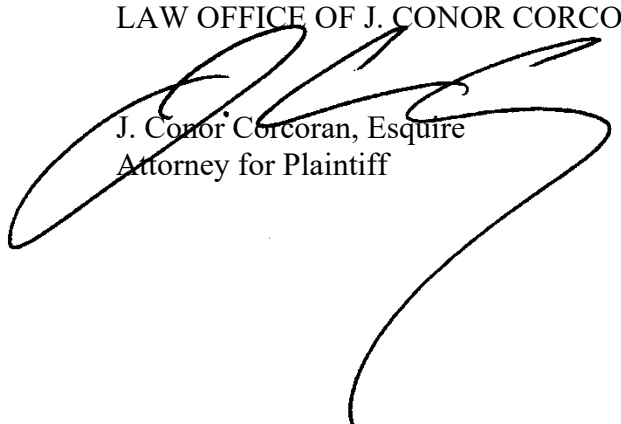
V. Conclusion

Plaintiffs respectfully request entry of the attached Protective Order.

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: January 2, 2019


J. Conor Corcoran, Esquire
Attorney for Plaintiff

¹⁰ See The Parallel Election, © 2022 by Gregory Stenstrom and Leah Hoopes, published by Interrita Publishing, ISBN Nos. 978-1-958682-29-6, 978-1-958682-28-9, and 978-1-958682-27-2.

CERTIFICATE OF SERVICE

I, J. Conor Corcoran, Esquire, hereby certify that a true and correct copy of the foregoing Motion for Protective Order was sent to the following via email and the Court's efileing system:

Michael T. Madaio, Esq.
mmadaio@habbalaw.com
Attorney for Defendants Trump and DJTFP, Inc.

Defendants Giuliani and Giuliani PLLC, *pro se*
Truthandjustice4u@protonmail.com, maria.ryan@giulianipartners.com

Hoopes & Stenstrom Defendants, *pro se*
leahfreedelcopa@protonmail.com, gstenstrom@xmail.net

Respectfully Submitted,

LAW OFFICE OF J. CONOR CORCORAN, P.C.

Date: June 6, 2023



J. Conor Corcoran, Esquire
Attorney for Plaintiff