

State of New Mexico
Seventh Judicial District Court
County of Socorro

Green Lion Media LLC
T. Reese Janca Executor

vs.

Case No#: D-725-CV-2017 -00232

Steve Edmondson, d/b/a
Socorro Community Radio, LLC.

Entry of Appearance Pro Se

I, respondent on behalf of parties Green Lion Media and T. Reese Janca hereby enter an appearance Pro Se as allowed for under New Mexico Civil Procedure Metropolitan Court Rule 3-107.

A. Pro se appearance by an individual. A party to any civil action may appear, prosecute, defend, and appeal any proceeding:

- (1) if the party is an individual party; in person

B. Other authorized non-attorney appearances. A party to any civil action may appear, prosecute, defend, and appeal any proceeding:

- (3) if the party is a corporation or limited liability company, whose voting shares or memberships are held by a single shareholder or member of a closely knit group of shareholders or members, all of whom are natural persons active in the conduct of the business, and the appearance is by one such shareholder or member who has been authorized to appear on behalf of the corporation or limited liability company.

Respondent, T. Reese Janca is identified as an individual party in the matter before the Court and the remaining single shareholder of Green Lion LLC., Green Lion LLC authorizes T. Reese Janca to appear on behalf of the Limited Liability Corporation in all matters before the Court and engage all necessary appeals. I understand that the NOTICE OF ALL HEARINGS WILL BE MAILED TO THE ADDRESS GIVEN BELOW UNLESS I PROVIDE A DIFFERENT ADDRESS IN WRITING to the Clerk of the Court and to all parties of record.



Respondent Pro Se

T. Reese Janca
Green Lion LLC
P.O. Box 949
Socorro, NM 87801
575-200-4872

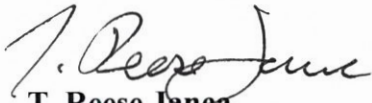
I hereby certify that a true and correct copy of this Entry of Appearance was emailed to candice@borderlawoffice.com, dean@borderlawoffice.com the Border Law Office on record for the Plaintiff.

Certificate of Service

I hereby certify that a true and correct copy of this Entry of Appearance was emailed to
candice@borderlawoffice.com

dean@borderlawoffice.com

The Border Law Office on record for the Plaintiff.



T. Reese Janca
Pro Se

State of New Mexico
Seventh Judicial District Court
County of Socorro

Green Lion Media LLC
T. Reese Janca Executor

vs.

Steve Edmondson, d/b/a
Socorro Community Radio, LLC.

Case No#: D-725-CV-2017 -00232

February 15th 2022

Motion for Change of Venue

Movant Green Lion Media LLC, Manager T. Reese Janca by Pro Se representation respectfully request a CHANGE OF VENUE under NM Stat § 38-3-3 (2017) outside the 7th Judicial District given continued discoveries, future developments and historical facts that District Judge Roscoe Woods was disqualified the ability to serve as a mediator between the parties in 2018 as a result of ads ran with Green Lion LLC. in 2018. The Defendant believes he cannot obtain a fair trial in the 7th Judicial District against the Plaintiff's material breach of contract for which the case is in civil litigation because:

- Mercedes Murphy's maternal parent Rowena Baca maintains an undisclosed long term social and political relationship with Rosie and Don Tripp
- Rowena Baca's relationship is documented back to at least 2011 when she was nominated as Republican delegate.

- Rosie Tripp was New Mexico Republican National Committee Woman in 2011
- Don Tripp donated \$500 to Mercedes Murphy's 2014 Campaign for confirmation election.
- Plaintiff Steven L. Edmondson relationship with Don Tripp has extended over his operation of KYRN license 2014-2017 and a social relationship which he frequently boasts extending beyond occasional interviews.
- Plaintiff Steven L. Edmondson has been invited directly to local Republican events and witnessed participating including an event with Glen Duggins in Lemitar.
- Trial is set to a Bench Trial presided over by Judge Murphy whose appointment as judge ran for confirmation election in 2014 placing ads with the Plaintiff which were broadcast on KYRN in Socorro as previously raised with the court.
- Presiding Judge Mercedes Murphy has allowed the appearance of impartiality to emerge with actions favorable to the plaintiff without material facts creating a record of bias in case history and actions.
- Plaintiff operating an FM Broadcast radio station within the 7th Judicial District has '*undue influence over the minds of the inhabitants of the county*'.
- Plaintiff has used such influence prior with the former editor Scott Turner of El Defensor Chieftain to control and limit public notifications by the

Defendant and news coverage which would benefit the Defendant and challenge the Plaintiff.

Defendant has been economically destroyed by the Plaintiff's Material Breach of Contract in failing to legitimize the radio station sale by filing the application for approval with the FCC which in no way would have deprived the Plaintiff of money due for the sale and would have made the Plaintiff's sale and transfer of the radio station legitimate. Due to the delays in being able to present evidence in trial where findings of fact and conclusion of law would have relieved the Defendant's injury, the injury persist daily while the Plaintiff has been further enriched by Court rulings without a finding of fact that the original complaint filed on 12-22-17 was with standing and ripe for judgment. Neither during the April 23rd 2017 hearing was material facts provided or introduced in to evidence that the repossession terms of the original complaint exhibit had in material fact been violated by the Defendant.

It is with all respect that the Defendant seeks a Change of Venue out of the 7th Judicial District Court. Judge Murphy's own ruling against Judge Roscoe Woods serving as mediator between the parties for running private practice advertisements with the defendant in mediation in 2018, yet denying the first 'Motion for Change of Venue' in August 26 2019 when records show she ran adds with the Plaintiff in 2014 which contributed to her confirmation to the Bench. The Defendant now has records of a long time political and social affiliation further influencing the impartiality of the bench and delaying remedy to the Defendant.

Plaintiff also has a direct and continual relationship with Don and Rosie Tripp and the Republican Party which is documented through his assumption of KYRN in 2014. Don and Rosie Tripp under Don Tripp and Friends of Don Tripp have financially and politically contributed to Judge Murphy's position. Rowena Baca is a long time family friend with Don and Rosie Tripp dating back through documented evidence to 2011 when she was elected a Republican Party Delegate. Given the evidence of impartiality in the matters historic record and the Bench's unwillingness to answer factually why when the Plaintiff couldn't disqualify now Judge Roscoe Woods, that the trial was 'scratched' from the Court calendar without process the week of trial, request a venue in Albuquerque or Santa Fe out of KYRN's licensed coverage, Republican political influence by key political figures and provides exhibits and current court records to substantiate concerns.

Further Exhibits in Addition to August 2019 Motion to Change Venue Exhibits

A) New Republican Woman March 2011 -Rowena Baca Delegate & Rosie Tripp NM National Committee Woman

B) Don Tripps and Friends of Tripp financial contribution to Judge Mercedes Campaign

Exhibit

A

Exhibit A

Long-standing relationship between Judge Murphy, Rowena Baca and Rosie Tripp wife of Don Tripp to at least 2011.
2014-2017 Relationship of Edmondson to Don Tripp as a high profile political candidate and contributor to Mercedes
Murphy's campaigns

2014 Mercedes Murphy ran ads with Edmondson

2018 Roscoe Woods ran ads with Green Lion was disqualified as mediator



Winter Board Meeting:

February 17, 18, and 19, 2011

Inn of the Governors

101 W. Alameda

Santa Fe, New Mexico

THURSDAY, February 17, 2011

The Executive Committee of the NMFWR met on Thursday, February 17, 2011 at The Inn of the Governors in Santa Fe from 4:05 - 4:45PM.

About sixty members of the NMFWR gathered at 7:30 PM for a meeting with several of our Republican Legislators.

seated in the gallery.

Friday afternoon, the members gathered in the hotel lobby to coordinate car pools for the trip to the Governor's mansion. About one hundred NMFWR members enjoyed live musical entertainment, refreshments and the beautiful views of Santa Fe from the hilltop mansion before Governor Susana Martinez arrived. The Governor welcomed us to the mansion and introduced some of her staff. She spoke briefly about her new job as Governor and thanked Republican women for all the work they did to help her win the election. She ended by saying "this house belongs to the People of New Mexico and I am only living here for a while." She posed

ELECTION OF NEW N.M. CHAIR KAREN BAYLESS

Socorro County FRW

President, Rosemary Rutra reported that the SCFRW has been very busy since November. They elected new officers, decorated a Christmas tree at the Macy Center for Good Samaritans, hosted a Christmas tour during which a member took Lt. Gov. John Sanchez to Parkview Elementary School to meet a third grade class, and hosted the County Convention at which one of their members, Rowena Baca, was chosen as a delegate.

In late January, they also made calls and got out the vote to help member Kimberly Gonzales win her seat to the school board. They provided the food for a meeting with Representative Steve Pearce, and on February 12th member Della Vega was awarded Volunteer of the Year by the Chamber of Commerce.

Top photo: Several Republican Legislators



**NMFWR - BOARD OF DIRECTORS
2010-2011**

NM National Committee Woman Rosie Tripp

**National Federation of Republican Women
Board and Committee Members**

Legislative	Karen Bayless
Speaker's Bureau	Gayla McCulloch
Campaign & Membership	Elaine Miller
Member at Large & Regional Director	Jo Mitchell

Immediate Past President Jo Mitchell

Past Presidents	JoAnn Johnson
	Karen Bayless
	Jan Brooks
	Alma Green
	Patricia Lawrence
	Jean Cirracks
	Peggy Traver
	Marge Logan

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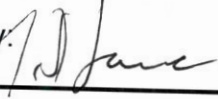
Exhibit B

Date Contribution	Name	Occupation	Amount
	Total		\$8,617.97
9/12/2014	Mercedes Murphy	Attorney	\$6,017.99
9/12/2014	Steven Argabright		\$200.00
9/16/2014	Beau Dowell		\$100.00
9/17/2014	Sierra County Republican Party	Republican Party	\$400.00
9/18/2014	Lee Deschamps	Attorney	\$300.00
9/20/2014	Linda Bunning		\$100.00
9/22/2014	Norma Lorang	Retired	\$250.00
9/22/2014	Rowena and Adolph Baca	Business Owner	\$529.98
9/28/2014	Bill and Joy Wrye		\$200.00
9/29/2014	Don Tripp	Business Owner	\$500.00
10/3/2014	Susan Esquivel		\$20.00

Respectfully submitted Pro Se,

T. Reese Janca Manager

Green Lion Media LLC.

By: 

Pro Se, T. Reese Janca

General Manager

Green Lion LLC.

P.O. Box 949

Socorro, New Mexico 87801

(575) 200-4872

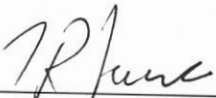
mrtrjanca@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of February, 2022, the foregoing was emailed to Plaintiff's Attorney of record:

candice@borderlawoffice.com

dean@borderlawoffice.com



Defendant Pro Se,
T. Reese Janca Manager
Green Lion Media LLC

State of New Mexico
Seventh Judicial District Court
County of Socorro

Green Lion Media LLC
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vs.

Case No#: D-725-CV-2017 -00232

Steve Edmondson, d/b/a
Socorro Community Radio, LLC.

February 22, 2022

**RESPONSE TO MOTION FOR OF DISMISSAL OF DEFENDANT'S COUNTERCLAIM
AND SUMMARY JUDGEMENT FOR THE PLAINTIFF**

Persisting in the intentional avoidance or incompetent failure to provide the Court any factual evidence that material issues exist to demonstrate with high probability that when the complaint for 'Money Due and Repossession' was filed on December 22, 2017 that the Plaintiff had legal standing and the contract between the parties was ripe for judgment, Plaintiff again files a frivolous and distractive harassment with the Court which lacks either direct or circumstantial evidence of material facts related to the ORIGINAL COMPLAINT and EXHIBIT filed with the Court and continues to seek Judgment without meeting the Plaintiff's onus to meet the standard of proof in civil matters. Opposing party instead seeks without conducting a deposition or discovery in to Green Lion's financial state since the business was fraudulently destroyed in 2018 by the Plaintiff's refusal of payments, refusal of full sale price and falsification of Federal documents, to obtain Dismissal of the Defendant's Counterclaim and Summary Judgment without meeting the Standard of Proof that the Complaint before the Court

would be a miscarriage of justice. Using ad hominem circumstantial attacks using the hearsay of social media without seeking factual material evidence of the ability to pay through deposition or discovery is again either intentionally relying on the court to accept and process frivolous filings and harass the injured party further or incompetent legal representation. It is clear the ad hominem abusive attacks against the Defendant 'showing no regard for the legal process' with failure of the Movant to present material evidence to meet the standard of proof required in a Civil matter is indeed an actual abuse of the legal process. The Movant has provided no grounds to substantiate 'Dismissal of Counterclaim and Summary Judgment for the Plaintiff' failing to provide any material facts or evidence that the Movant 's ORIGINAL COMPLAINT has LEGAL STANDING or is it RIPE FOR JUDGEMENT. Respondent, request the Plaintiff's Motion for Dismissal is denied by the Court.

Respondent Replies

1. **Ad Hominem Circumstantial**-the Movant has not proved through deposition or discovery that the Respondent has the actual capacity to make payment. The statement is unsound.
2. **False**-the statements are neither libelous nor disparaging
3. **False**-Movant has not shown through deposition or discovery the Respondent has an authority or capacity to change a vague description 'previous post'
4. **False**-Neither Respondent or previous counsel District Judge Roscoe Woods filed a Motion to Vacate January 19-21 2021 trial with the 20th scheduled in Truth or Consequences with witnesses and web page archives reflected by the Official Court docket online which was changed without process or answer by the Bench not the Respondent who has no access or authorization to modify the Court Calendar or set Court actions within the 325 days of

representation by District Judge Roscoe Woods prior to appointment to the Bench after Movant failed to disqualify him July 15, 2020.

Movant continues to obfuscate the argument before the Court in the ORIGINAL COMPLAINT with attached EXHIBIT filed on December 22, 2017, in an attempt intentionally or incompetently to avoid meeting the 'Burden of Proof' to establish a legal standing ripe for judgment through material facts and evidence for the ORIGINAL COMPLAINT which have not been produced since the complaint was filed. It is highly probable the originating attorney knew his Client lacked an actual breach of contract and advised Movant to refuse payment while seeking a 'Default Judgment' in January 2018 as evidenced in Court records and exhibits. Without the finding of facts or material evidence necessary to meet the 'burden of proof' that the Respondent was in breach of the ORIGINAL COMPLAINT'S attached EXHIBIT 'Repossession Clause'. A private and improper agreement between Filosa and Deschamps without Court Order became the false basis for Contempt further harming the Respondent. A non-existent order with no material facts or evidence presented April 23, 2018, resulted in a baseless contempt ruling in order to distract from the lack of merits and standings in the ORIGINAL COMPLAINT used to divert attention away from the main argument and form an new argument which has been the basis of every motion since April 23, 2018 and continues in addressing the secondary argument presented in the motion before the Court to dismiss the Defendant's extensive injury.

The Movant 's Ad Hominem abusive attacks about the Respondents character are observational evidence that it is by a fabricated character that the Respondent should be denied redress and justice within the Court when burden of proof cannot be met by the Movant. An open *'MOTION FOR ORDER TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR MONEY DUE and REPOSSESSION WITH PREJUDICE AND GRANT SUMMARY JUDGMENT*

IN FAVOR OF DEFENDANT'S COUNTERCLAIM AND SET EVIDENTIARY HEARING FOR DAMAGES ONLY' by the Respondent have documented and detailed the material facts and evidence in the matter before the Court as guided by **Exhibit 1 -Rule Set 13 -Uniform Jury Instructions-Civil** and met the requirements for Summary Judgment are without answer.

Respondent seeks relief from the Plaintiff's abuse of the judicial process and failure to meet the 'burden of proof' to give material facts and evidence the main argument in the Original Complaint is with legal standing and ripe for judgment. Respondent request a review of the material facts and evidence provided by the Defendant in Court Record **Exhibit 2** filed on December 23rd 2019 in addition to a DENIAL OF THE PLAINTIFFS MOTION and GRANT the Defendants *MOTION FOR ORDER TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR MONEY DUE and REPOSSESSION WITH PREJUDICE AND GRANT SUMMARY JUDGMENT IN FAVOR OF DEFENDANT'S COUNTERCLAIM AND SET EVIDENTIARY HEARING FOR DAMAGES ONLY'* having met the burden of proof that it is more probable than not that the Plaintiff has committed anticipatory breach of contract and has wrongfully benefited and been enriched from his breach of contract.

Respectfully submitted as Pro Se Representation
For Green Lion Media LLC


By

T. Reese Janca KD7GSB
Chief Executive
Green Lion Media LLC.
P.O. Box 949
Socorro, NM 87801
(575) 835-2382

Supportive Exhibits

List of Supportive Exhibits

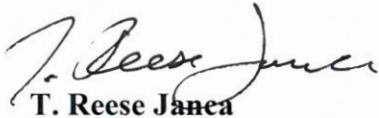
1. **Public Document** -Rule Set 13 -Uniform Jury Instructions-Civil
2. **Court Record** December 2019 -'MOTION FOR ORDER TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR MONEY DUE and REPOSSESSION WITH PREJUDICE AND GRANT SUMMARY MOTION IN FAVOR OF DEFENDANT'S COUNTERCLAIM AND SET EVIDENTIARY HEARING FOR DAMAGES ONLY'

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dean@borderlawoffice.com

The Border Law Office on record for the Plaintiff.



T. Reese Janca
Pro Se