IN THE CIRCUIT COURT OF SAINT LOUIS COUNTY

STATE OF MISSOURI

JUSTIN DUANE WACH	)	Case No. 21SL- DR00305
Petitioner,	)	Division 15
vs.	)	
Alexandra M. Dean	)	FILED 7/31/23
Respondent,	)	
BRIAN DUANE WACH and	)	
GINA MARIE DEAN	)	
Intervenors.	)	

FILED
AUG 01 2023
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

EMERGENCY MOTION TO CONTINUE/ MOTION TO QUASH

I, Alexandra M. Dean, file this Emergency Motion to Quash the Amended Verified Motion for Temporary Restraining Order With Notice and Petition for Preliminary and Permanent Injuction filed by Intervenor(s) on July 25, 2023. Clearly since this was only six days ago, I have not received adequate notification regarding this hearing, nor have I been officially served with any document(s). It is necessary that I am properly served with all document(s) and exhibit(s) to support the claim(s) being made against me and that these documents are served with ample time to respond.

1. Despite my multiple attempts to obtain all required paperwork from Sargent Simon of the Saint Louis City Sheriff's Department regarding the disruption caused by the

Intervenor(s) at my home, I have not been informed of any Permanent Injunction. The Sheriff's Department only mentioned their efforts to serve me with multiple unlawful Involuntary Commitment Orders initiated by my abusive mother, Gina Dean, but they made no mention of an Injunction. Fortunately, Dr. Levin, my forensic psychologist, intervened by contacting the Sheriff's Department and clarified the accusations and rumors being spread by the Intervenor(s), resulting in the failure of their attempts to have me involuntarily committed.

2. There has been zero police presence at my home attempting to serve paperwork ever since they stopped following the unwarranted Involuntary Commitment Order(s). Therefore, I assumed the chaos had ended and that I was finally relieved of making appearance(s) in the 21st Judicial Court due to the fact that this is now an Appeal case, which the Circuit Court has zero jurisdiction over. The Intervenor(s) clearly began filing frivolously once again, in the Circuit Court, in order to gain tactical advantage(s) over Appeal Case No. ED111830 (Federal Rule of Civil Procedure 11). Therefore, I'm still unsure why Judge Lasater is deeming it appropriate to allow the other parties in this case to harass and gang up on me, in the 21st Judicial Court, without filing proof of service or evidence to back their pleading(s) pursuant to Missouri Court Rule 84.24(a)(4), Supreme Court Rule 2-2.3, and Supreme Court Rule 55.03(c).

3. Furthermore, I strongly assert that filing for multiple 96-hour involuntary detentions on my behalf is not only highly unethical but also a direct violation of my inalienable Constitutional rights. Such actions seem to be a deliberate attempt to manipulate my chances at Appeal and expose me to the cruel and unusual punishment(s) meted out by

Judge Lasater. The following 96 hour detention(s) were recently unlawfully filed against me by Intervenor, Gina M. Dean.

- In Saint Louis City on June 16, 2023
- In Saint Louis City on July 5, 2023
- In Saint Louis County on July 14, 2023. The timing of the detention, filed just before the trial to reopen this Case for evidence on July 17, 2023, strongly suggests that this specific trial was a deliberate and calculated effort by the Saint Louis County Family Court to illegally detain me once again, solely based on hearsay and their personal hostility towards me. This raises significant concerns about the fairness and integrity of the proceedings, further supporting my plea for the dismissal of the trial and a thorough examination of the action(s) taken in this matter by a new Judge within the Appeals Court.

4. The Intervenor(s) in this Case seem to hold the belief that they are suffering irreparable harm, solely due to their discontent with the community exercising our First Amendment right(s) to peaceably assemble, and freedom to express our concern(s), about the serious offense(s) committed against me and other mothers in the 21st Judicial Court.
5. It is essential to emphasize that a Temporary Restraining Order(s) with Notice cannot be served through email but must be served by the proper agency, to ensure the recipient received and read the paperwork on that very day. Proper notice gives individual(s), who work more than 40+ hours a week, a fair opportunity to seek legal counsel and establish their schedule. A trial to be held only six days after the initial filing, without notice, is simply unachievable for anyone who has a set work schedule.

6. In order to safeguard my Constitutional rights to Due Process, it is essential that an ample extension of time is granted, allowing me the rightful opportunity to submit counter arguments opposing the issuance of what seems to be a Permanent Injuction (MO Const art I § 10). It is crucial to understand that without sufficient time to file a Discovery request for all of Laura Stobie's Exhibits, which support her extravagant accusation(s), I cannot adequately defend myself or be heard in this Court (Supreme Court Rule 2-2.2 and Supreme Court Rule 2-2.6).
7. Attorney Brian M. Wendler, who I have recently been speaking with about representing me in this matter, is unable to make it to a trial on such short notice. Therefore he requested I file an emergency order to continue. This will also give Dr. Daniel Levin proper notice to prepare his testimony regarding this situation and appear at the trial as an expert witness.
8. Additionally, a Restraining Order, of any kind, must be supported by undeniable evidence (Supreme Court Rule 92.02(a). The accuser(s)' interpretations, complaints, claims, rumors, and slander should not serve as legal ground(s) for a Temporary Restraining Order, let alone a Permanent one. There is simply no weight to the evidence that has been provided to support the Intervenor(s) claims of irreparable harm. Despite the Intervenor(s) and their associate(s) fictitious claims, the facts are
    - I have zero history of inflicting or causing physical harm, bodily injury, or assault on anyone.
    - I have zero history of stalking or causing fear of physical harm, bodily injury, or assault on anyone.
    - I have zero criminal record.

- I have never had a full order of adult or child protection before.
- I have only ever suffered from unlawful and frivolous T.R.O.(s) based on complaints, filed in Judge Lasaters Courtroom, in order to illegally sway my custody rights.
- I have never been convicted of a dangerous felony under Missouri law.

9. As a result, I formally ask for the dismissal with prejudice of the unjustified Permanent Injunction Trial on August 1, 2023 due to insufficient evidence, discrimination, and harassment encountered during the custody proceeding(s). Alternatively, I request a rescheduling of the trial with a 30-day notice so I can make arrangements to take time off work and gather all necessary paperwork. It should be noted that if this Court were genuinely adhering to MO. Law, this trial would be dismissed as it appears to be yet another attempt to unlawfully detain me without valid justification, a clear violation of the Missouri Constitution Bill of Rights.

I, Alexandra M. Dean, solemnly declare that the foregoing statements and representations are true to the best of my belief, knowledge. By: /s/ Alexandra M. Dean. Petitioner. 2215 Montana St, St. Louis, MO 63118 314-323-8267 consciousspparrow1719@gmail.com.

CERTIFICATE OF SERVICE: I hereby certify that on the 31st day of July, 2023, a true and exact copy of the foregoing was served via e-filing system to all parties of record. /s/ Alexandra Dean.

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Full Legal Name (Print): Alexandra M. Dean

Signature: alex Dean

Date: 8/1/23

Full Legal Name (Print): Brandon Leigh Johnson

Signature: Brandon Leigh Johnson

Date: 8/1/23

Notary:

BRANDON LEIGH JOHNSON
Notary Public, Notary Seal
State of Missouri
St. Louis County
Commission # 21402941
My Commission Expires 12-27-2025

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