

EXHIBIT DDD

from James Lawrence v. Hearst

WHO IS THE REAL VICTIM?

SUSPICIOUS HAPPENING FROM JAMES LAWRENCE V. WENDY HIGGINS CHAMBERS: A true story with substantial questions in need of being answered.

The following is significant if not fascinating so bear with the story telling. I write 2 pages in single spaces because a trial has yet to be afforded to me to show all the details of this persecution in tune with the special zeitgeist that demands everyday people weigh in on the new victim playing trends. This entire fiasco is more than a novel. This will be the only section of this Brief in single space. It is a 2-page true story.

I chose to sue relative parties in the order of the attack with Altice/News 12 being the first sued. My next lawsuit was against Wendy Higgins Chambers for slander, for she is not only the sole instigator for the special news outside of the actual arrest but is the only woman coming forward aka Hearst's only witness to date. **See Exhibits CCC**. In James Lawrence v. Wendy Higgins Chambers, a Connecticut Judge Edward Krumeich dismissed the case in Sept. 2020 based on a new 2018 Ct. Anti-SLAPP law giving people the right to express their opinion for "*concerns for the community*". This Judge made the opinion that Wendy Higgins Chambers never used the term "stalking" or "harassment".

Judge Krumeich:

³The media's use of the words "harassing" and "stalking" in articles or broadcasts in which defendant was interviewed, terms not used by defendant, cannot be attributed to her, although "preying" reasonably may be understood to refer to this sort of criminal activity.

Indeed Wendy Higgins Chambers did not deploy this language and even avoided this language within her pathetic Affidavit submitted in the lawsuit. I believe this older woman (**See Exhibit CCC**) is a virtue signaling wannabe social justice warrior targeting me for my websites and that she not only pushed a false story of our one-time encounter but also knowingly persisted with known false information because she was the sole and only woman involved with both media hit jobs. Once again, her visit to police resulted in no Incident Report. **The following events are very telling leaving Hearst with a sole witness with no credibility.**

So myself realizing this person does not have the ultimate power to remove libel from Westport News/Hearst Communications, I choose not to Appeal being financially and emotionally tapped and seek to direct my efforts at Westport News/Hearst. In Sept. 2020 Wendy Higgins Chambers filed a Motion for me to pay her Attorney Fees of **\$16,967.00** for a basic Motion to Dismiss.

II. Conclusion

Wherefore, the defendant by and through her counsel respectfully requests and order granting defendant's Motion for Attorney's Fees and Costs pursuant to C.G.S. § 52-196(f)(1) in the amount of \$16,967.00.

YES \$16,967.00 FOR A MOTION TO DISMISS.

So I write my Objection to Bill of Costs showing my own “costs”, and we then have a scheduled Nov. 24, 2020 Hearing on the Attorney Fees. **At this Hearing the Judge sees that once again that Wendy Higgins Chambers is not present – she is never seen or heard from.** Once again only lead attorney Jessica Wraag is present. The Bill of Costs has 5 other attorneys listed from 2 other law firms. The Bill of Costs also was replete with Emails between Wendy Higgins Chambers and her lead attorney – easily the bulk of the “costs”. **The Judge said I was entitled to question all involved in the costs – including Wendy Higgins Chambers.** The Judge continued the Hearing to a future date in December 2020 with Wendy Higgins Chambers and other attorneys expected to be present for questioning.

Within my Objection to Costs, I presented the Judge with a strong theory about Wendy Higgins Chambers hidden agenda - targeting me for that “*obscure website*” mentioned in Hearst’s article which is sadly a common Social Justice Warrior technique in these troubling times. Given her physical profile (see Exhibit CCC) this is a real-world possibility. I then concluded by proposing that since the Judge opined that Wendy Higgins Chambers **did not use the word stalk or harass** that she should be reaching out to Hearst/Westport News to disassociate herself from the article for this is easily done in the electronic age. I proposed paying the attorney fees based on proof of this action.

Yet on Dec. 17, 2020, a week before the schedule reconvened Hearing, WENDY HIGGINS CHAMBERS WITHDREW HER MOTION FOR COUNSEL FEES.. Is this sole witness of Hearst no longer feeling like a victim? WHY DID SHE WITHDRAW THE MOTION FOR ATTORNEY FEES IF SHE CLAIMS SHE WAS SOME KIND OF VICTIM? She just got sued for a year and lost \$17,000! What is going on here? Why is this liar not showing up to the Hearing and asking for at least some money? ... like at least get \$10,000 or whatever?

THEORIES:

- 1:** She is being nice after getting the facts about me and the arrest (unlike Hearst) thereby destroying the reliability of Hearst’s only witness to date.
- 2:** She is afraid to be interrogated by me because I know of her lies and can expose her duplicity possibly causing another lawsuit directed at her.
- 3:** Hearst following this case advised her not to be questioned now.

None of these very real theories are good news for Hearst.

Meanwhile this Judge Edward Krumeich should be feeling negligent letting this cowardly agenda-driven liar off without a proper trial. Wendy Higgins Chambers is obviously hiding AND AFRAID TO BE QUESTIONED. She easily could have **showed herself** and asked for less money BUT NO - SHE GOES FROM ASKING FOR \$17,000 TO 0 – NOTHING – ZILCH BECAUSE SHE IS HIDING SOMETHING. RED FLAG to all Judges afraid to criticize women and give rights of men a proper forum in the extreme time of MeToo. Wake up! Women lie – a lot.

Would a jury not find this lack of desire to collect \$17,000 in legal fees as strange or "suspicious" to say the least? She is an alleged "victim" .. right? She spent the premeditated time to cause persecution of me (and only her - no other woman) with two major media companies in the area – the most powerful media companies and yet now ... not worth getting compensated for her experience with me? A travel agent in the time of Covid can be compensated \$17,000 and she does what? Ask for nothing?!!! Why not show up and answer questions? Why not show up and ask for less? **Ghosting the legal system should alarm Judge.** I DESERVE A TRIAL WITH REPORTER SOPHIE C. VAUGHAN AND WENDY HIGGINS CHAMBERS ANSWERING QUESTIONS TO FIND OUT MORE!

DOCKET NO. FST CV20-5022942S : SUPERIOR COURT
JAMES LAWRENCE : J.D. OF STAMFORD/NORWALK
VS. : AT STAMFORD
WENDY HIGGINS CHAMBERS : OCTOBER 9, 2020

MOTION FOR FEES AND COSTS

Pursuant to the Court's Memorandum of Decision dated September 21, 2020 [docket no. 102.03] and under C.G.S. § 52-196a(f), the Defendant, Wendy Higgins Chambers hereby moves for an order of costs and attorney's fees, including costs and fees incurred in connection with the filing of the special motion to dismiss. Under C.G.S. § 52-196a(f)(1), the Defendant, after prevailing on a Special Motion to Dismiss, is entitled to reasonable costs and attorney's fees.

I. Applicable Law and Details on Costs and Fees

General Statutes Section 52-196a(f)(1) state in pertinent part, as follows: "(1) If the court grants a special motion to dismiss under this section, the court shall award the moving party costs and reasonable attorney's fees, including such costs and fees incurred in connection with the filing of the special motion to dismiss...." In its ruling dated September 21, 2020 [docket no. 102.03], the Court ordered the defendant, through counsel, to file proof as to such costs and fees by October 15, 2020. Accordingly, Defendant Ms. Chambers, through counsel, submits the following proof of attorney's fees and costs related to the defense of the plaintiff's lawsuit, which gave rise to attorney's fees and costs as follows:

The undersigned Attorney Jessica Z. Wragg filed an appearance on February 21, 2020 for the defendant Ms. Chambers, after being assigned defense counsel in this matter by defendant's insurance carrier. The attached invoices represent attorney's fees and costs the undersigned has

incurred in connection with defending against the plaintiff's lawsuit, including but not limited to the researching, writing, filing, and argument of the Special Motion to Dismiss and Reply memorandum. These costs and attorney's fees total: \$14,829.50.

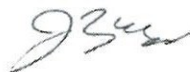
In addition, the undersigned respectfully submits the invoices of plaintiff's personal attorney, Attorney Steven Frederick of Wofsey, Rosen, Kweskin & Kuriansky, LLP, in connection with his representation of the defendant Ms. Chambers in this litigation, for services rendered largely prior to coverage approval by defendant's insurance carrier. Attorney Frederick's fees and costs total \$2,137.50

Therefore, the total fees and costs are: \$16,967.00. In support of this motion, undersigned counsel provides the attached affidavit and invoices (Exhibit A).

II. Conclusion

Wherefore, the defendant by and through her counsel respectfully requests and order granting defendant's Motion for Attorney's Fees and Costs pursuant to C.G.S. § 52-196(f)(1) in the amount of \$16,967.00.

THE DEFENDANT



BY _____

Jessica Z. Wragg
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THEN THE MYSTERIOUS WITHDRAWAL.

AGAIN - WHAT IS REALLY GOING ON HERE?

WITHDRAWAL

JD-CV-41 Rev. 1-18

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

ADA NOTICE

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

Docket number FST-CV-20-5022942-S
Return date (For Civil and Housing cases only) Mar-10-2020
Answer date (For Small Claims cases only)

Instructions:

1. Complete this form by selecting any applicable withdrawal categories below.
2. File with the clerk.

Name of case (First-named Plaintiff vs. First-named Defendant)

LAWRENCE, JAMES v. HIGGINS CHAMBERS, WENDY

<input checked="" type="checkbox"/> Judicial District	<input type="checkbox"/> Housing Session	Address of court (Number, street, town and zip code) 123 HOYT STREET STAMFORD, CT 06905
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Dispositive (Complete) Withdrawal

(Do not check the following two boxes if any intervening complaints, cross complaints, counterclaims, or third party complaints remain pending in this case. See below for partial withdrawal of action.)

- (WDACT) The Plaintiff's action is WITHDRAWN AS TO ALL DEFENDANTS without costs to any party.
- (WOARD) A judgment has been rendered against the following Defendant(s):

_____ and the Plaintiff's action is WITHDRAWN AS TO ALL REMAINING DEFENDANTS without costs.

Partial Withdrawal

The following pleading(s), motion(s) or other paper(s) in the case named above is or are withdrawn:

- | | |
|---|--|
| (WDCOMP) <input type="checkbox"/> Complaint | (WAPPCOM) <input type="checkbox"/> Apportionment Complaint |
| (WOC) <input type="checkbox"/> Counterclaim | (WDINTCO) <input type="checkbox"/> Intervening Complaint |
| (WDCC) <input type="checkbox"/> Cross Complaint (cross claim) | (WDTHPC) <input type="checkbox"/> Third Party Complaint |
| (WDCOUNT) <input type="checkbox"/> Counts of the complaint: _____ | |
| (WOAAP) <input type="checkbox"/> Plaintiff(s): _____ | |
| (WOAAD) <input type="checkbox"/> Complaint against defendant(s): _____ | |
| (WOM) <input checked="" type="checkbox"/> Motion: Motion for Counsel Fees (Entry No. 116.00) | _____ only without costs |
| <input type="checkbox"/> Other: _____ | |

Signature of Filer(s)

Party D-01 WENDY HIGGINS CHAMBERS	; By MUSCO & IASSOGNA	Attorney or Self-represented party
Party _____	; By _____	Attorney or Self-represented party
Party _____	; By _____	Attorney or Self-represented party
Party _____	; By _____	Attorney or Self-represented party

Name & Address of Filer(s): **JESSICA ZIEMIAN WRAGG**
555 Long Wharf Dr. 10th Floor, New Haven CT

Certification

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on (date) **Dec-17-2020** to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

Name and address of each party and attorney that copy was or will be mailed or delivered to*		<i>For Court Use Only</i>
JAMES LAWRENCE (Self Represented) - 1655 POST RD EAST UNIT 804 WESTPORT, CT 06880		
*If necessary, attach additional sheet or sheets with name and address which the copy was or will be mailed or delivered to.		
Signed (Signature of filer) ▶ 426286	Print or type name of person signing JESSICA ZIEMIAN WRAGG	Date signed Dec-17-2020
Mailing address (Number, street, town, state and zip code) 555 LONG WHARF DRIVE 10TH FLOOR NEW HAVEN, CT 06511		Telephone number 203-782-4122