

1 IN THE COURT OF APPEALS OF THE STATE OF OREGON

2  
3 David Charles White, Petitioner-Appellant,

4 v.

5 Julia Annette White and  
6 James Shipley, Defendants-Respondents.

7 Washington County Circuit Court

8 25CV63661

9 A191709

10 MOTION FOR SANCTIONS BY ORS 33.105, ORS 18.899

11 David White, Appellant (PA)  
12 18965 NW Illahe St, Portland,  
13 [research@cctruth.org](mailto:research@cctruth.org)  
14 OR 97229  
15 503-608-7611  
16 Self-Represented

17  
18 Julia Annette White (R1)  
19 21408 SE 37th St.  
20 Sammamish, WA 98075  
21 Self-Represented  
22 good4thesoul@gmail.com

23  
24 James T. Shipley R2  
25 2233 NE 47th Ave.  
26 Portland, OR 97213  
27 Phone (503) 493-8383

28  
29 James Shipley Legal Counsel  
30 Joseph A. Pickels  
31 [jap@brisbeeandstockton.com](mailto:jap@brisbeeandstockton.com)  
32

33 Background

34 Docket facts:

35 1. Appellant had ADA by 42 U.S. Code § 12101 Americans with Disabilities

36  
37 Act in the lower case provided by the Presiding Judge in Washington

1 County. Jessica Richter, Records Supervisor Appeals Court of for his  
2  
3 car placard and a redacted VA MRI which depicts Appellants pinched  
4  
5 sciatic. Appellant, on August 16<sup>th</sup> 2026, sent to the  
6  
7 ADA email for the Court of Appeals proof of ADA with a Blue Placard  
8  
9 and MRI for Appellants pinched sciatica nerve. Appellant has ADA by  
10  
11 42 U.S. Code § 12101 Americans with Disabilities in  
12  
13 the case. Jessica Richter, Records Supervisor Court of Appeals is the  
14  
15 ADA coordinator for the Court of Appeals and has the ADA proof.  
16  
17 Appellant can only work on Pleadings until 11am or so every day  
18  
19 because that is when the pinched sciatic starts and Appellant must take  
20  
21 the VA RX and sleep. Therefore, the Attorneys sent the attached bond  
22  
23 issue in exhibit one to harass and cause massive stress in Disabled  
24  
25 Appellant.  
26

1 <https://www.anssiwellness.com/stress-anxiety-sciatica-connection/>

2  
3 [https://polarisptphx.com/can-stress-cause-sciatica-the-hidden-connection-](https://polarisptphx.com/can-stress-cause-sciatica-the-hidden-connection-explained/)  
4 [explained/](https://polarisptphx.com/can-stress-cause-sciatica-the-hidden-connection-explained/)

5  
6 <https://ocwellnessphysicians.com/what-triggers-sciatic-nerve-pain/>

7  
8 Plenty of links how added stress increases sciatic pain.  
9

- 10 2. Respondents filed non-applicable law motions without Proposed orders  
11 in violation of UTCR 5.100, trial court rules and ADA.  
12  
13

14 ORCP 5.010

15 ORCP 5.100

16  
17 ADA for plaintiff needed to respond to defendant's illegal filings  
18

19 ORCP 15 all Defendants pleadings are untimely.  
20

- 21 3. In the first Hearing Appellant explained how ORS 31.150 is non-  
22 applicable law because the County Property location just like any of the  
23 country property excepts courts are not Legislative, Executive, or  
24  
25 Judicial branches in Oregon Government. Judge  
26  
27

- 28 4. However, item 2 in ORS 31.250 says by other court law. This is what the  
29 attorneys whom deserve sanctions illegally brought in the 21DR02783  
30  
31

1 case and said this tort case was out of the dissolution. This was illegal  
2  
3 by ORS 161.450 says it is a Felony of Defendants to conspire to include  
4  
5 the fraudulent dissolution into this case.  
6

7 5. In addition, by ORCP 28 - Joinder of parties it was illegal for Shipley and  
8  
9 Stockton to bring up anything about the divorce without my as plaintiffs  
10  
11 permission. Therefore, the Order attached is illegal and must be  
12  
13 vacated. And By Previous prosecution cant be filed again.  
14  
15

16 6. The lower court judge was biased and violated Pagtalunan v. Galaza,  
17  
18 291 F.3d 639, 642 (9th Cir. 2002);, also violated judge code of ethics,  
19  
20 code of conduct and deserves ORS 14.250 Disqualification of justice,  
21  
22 judge, or magistrate Judge.  
23

24 7. In the first hearing Plaintiff read an opening statement which explained  
25  
26 why ORS 31.150 motion to strike was non-applicable law of defendants  
27  
28 because this action is about a filing at the County Property tax location.  
29

30 8. Honorable Judge Manchaca agreed and scheduled the requested  
31  
32 evidentiary hearing for May 29th 2026. Plaintiff, not to waste valuable  
33  
34 court time sent defendants an offer of compromise for negotiation.  
35  
36 Defendants had 7 days and failed to start negotiating. Defendants are

1  
2 abusing the courts by not negotiating and violations of ORCP 15, which  
3  
4 provides fourteen days for a Pleading response. Every pleading of  
5  
6 Respondents was untimely, non-applicable law causing disabled Plaintiff  
7  
8 massive pain from the induced stress of replying against defendant's  
9  
10 junk.

11  
12 As an example:

13  
14 Appellant filed Motion to wave transcripts on 9/1/2026 in the instant case and  
15  
16 made two small mistakes. It was amended then the untruthful  
17  
18 attorneys said they filed Exhibit One However Appellant cant find it in the  
19  
20 document list on the appeal.  
21

Reply Reply All Forward



Melissa McKibben <mm@brisbeeandstockton.com>

lawyer; research@cctruth.org; Prof Dave White; Grant Stockton; 'Work'; + 2

1 1

Shipley's Response/Objection to Motion to Waive Transcript - White v. White and Shipley, Case No. A191709

You replied to this message on 9/1/2026 1:57 PM.



Resp-Obj Shipley to W...  
118 KB

Dear Mr. White:

Please find attached Defendant/Respondent Shipley' Response/Objection to Motion to Waive Transcript which has been electronically filed with the court this afternoon. A copy will follow by First-Class mail.

If you have any questions, please feel free to contact our office. Thank you for your courtesies.

Sincerely,

**MELISSA L. MCKIBBEN | Senior Legal Assistant**

Assistant to Managing Partner Grant D. Stockton, Senior of Counsel

Lori H. Lindley, and Associates Rachel S. Burns & Michael C. Padden

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Which court? Local Court? Not filed in the Appeal! Not a notification to appeal

of pending local court action by ORCP 71 B(2). Not filed in the Appeal Court

Docket for the instant case until 9/03/2026. September first 2026 through

September third 2026 are three weekdays for the untruthful attorneys to file.

These attorneys and defendants in violation of the ADA by 42 U.S. Code §

12101 in the lower case for making Appellant respond and send waves of pain

through Appellants pinched sciatic nerve down his left leg. It is well-

1 documented that additional stress causes massive pain in a disabled Veteran.

2  
3 This could be web searched, fifteen doctors including the Crisis in Pain group  
4  
5 at the Portland VA have said this.

6  
7 Return email to them sent 9/2/2026

8  
9 As attorneys your filing is immediately accepted. However, it is not filed into  
10  
11 the docket. Mine hasn't been accepted yet. Also the well documented Multi-  
12  
13 level Degenerative Disc Disease has been with Appellant since Appellant  
14  
15 was in the Army and then the NSA as 11 Bravo Infantry with an 80 LB  
16  
17 backpack on my Back. My new GP at the VA is a 34 year old doctor  
18  
19 recently retired from the Army and now with the VA in Hillsboro. He said he  
20  
21 treated many 20-30 year old infantry men had the onset of Multi-level  
22  
23 Degenerative Disc Disease because they had an 80lb backpack and the  
24  
25 weapon in front. My Weapon was an M60 machine gun. He said this is just  
26  
27 like Agent Orange where they never told those guys the cancer possibility.  
28  
29 They didn't tell us 11 Bravo infantry anything about back issues. He also  
30  
31 said the fall of my retaining wall in 2016 was the final blow to finish of the  
32  
33 eventual issue that would happen anyway.

34  
35 **I am a severely disabled veteran**

36  
37 **1. Multi-level Degenerative Disc Disease**

- 1 2. Facet Arthropathy
- 2 3. Central Canal Stenosis
- 3 4. Yellow Ligament Hypertrophy
- 4



5 The nearly closed gap in the red circle is pressing against the sciatic  
6  
7  
8 fibers which route between the discs and join with the main sciatic. These  
9  
10 fibers are the ones which go down Petitioners left leg to the knee.

11  
12 [You can send this to any doctor and they will explain why I am in such pain.](#)

13  
14 Debunking R1 and R2 fake filing. Also in Exhibit two.

15  
16 “DEFENDANT-RESPONDENT SHIPLEY’S

1   RESPONSE TO APPELLANT’S “WAIVE TRANSCRIPTS MOTION”

2  
3   Respondent Shipley, through his Counsel, received Appellant’s apparent  
4  
5   Motion to Waive the transcript from the Circuit Court to this appeal.  
6

7   In the first instance, it remains unclear what exactly Appellant is appealing  
8  
9   from the Circuit Court. In the second instance, it is unclear what exactly

10  
11   Appellant is seeking in filing this Motion. If Appellant is seeking to exclude the  
12  
13   transcript from Circuit Court before this Court, Respondent Shipley objects.”

14  
15   This first paragraph proves R1 and R2 and their legal counsel whom deserve  
16  
17   sanctions authorized by ORS 33.105 and Pay Appellant 50,000 each for  
18  
19   violations of ADA by 42 U.S. Code § 12101 prescribes \$50,000 for first  
20  
21   offence, \$100,000 for second offence and judicial discretion more violations.

22  
23   Now with the filing in Exhibit One, each attorney gets one more violation but  
24  
25   new so \$50,000 owed to Appellant.

1  
2 The first paragraph proves James Shipley, Grant Stockton, Melissa McKibben,  
3  
4 Joseph Pickels Hannah Dahlen either don't understand English, are dumb  
5  
6 attorneys or deliberately causing massive pain to disabled Appellant. In any  
7  
8 case it causes Self Represented Appellant much pain to respond to false  
9  
10 pleadings of respondents.

- 11 1. Appellant's apparent Motion? Should Appellant call every motion of  
12 Respondents as apparent?
- 13 2. it remains unclear what exactly Appellant is appealing. Evidently they  
14 didn't read the accepted notice of appeal. They can download it from the  
15 Appeal Courts website.
- 16 3. it is unclear what exactly Appellant is seeking in filing this Motion. Read  
17 the header and after the introduction is the request.
- 18 4. "If Appellant is seeking to exclude the transcript from Circuit Court before  
19 this Court, Respondent Shipley objects". Mr. Shipley objects. Appellant  
20 has no money to order transcripts. Ordering transcripts would make the  
21 opening brief much easier. If Respondents want to order transcripts,  
22 they can pay for them, Appellant must certify them.

23 Therefore, the First paragraph is perjury by ORS 162.065 and false  
24

25 statements by ORS 162.075 then criminal defamation by ORS 135.733.  
26

27 The Second paragraph is perjury by ORS 162.065 and false statements by  
28

1   ORS 162.075 then criminal defamation by ORS 135.733. Oregon Law says if  
2  
3   an Attorney gets charged with one felony then they temporally lose their bar  
4  
5   license until convicted then lose their Bar license permanently. The same  
6  
7   attorneys filed non-applicable law in the lower court. Judge Ricardo J  
8  
9   Manchaca failed to adjudicate properly.

10  
11   Second paragraph.

12  
13   “From the Motion, it would appear Appellant is seeking to exclude everything  
14  
15   in the Circuit Court record after the Complaint was filed. Perhaps this is due to  
16  
17   an untimely request for the transcript from Appellant and, as a result, he seeks  
18  
19   to exclude the transcript in its entirety. Or perhaps Appellant does not like what  
20  
21   the transcript ultimately reveals.”

22  
23   None of this is true. Appellant said in the Notice of Appeal filed August 6<sup>th</sup>

24  
25   2026 only the docket list is needed to prove Appellants case. Again cant these

1  
2 attorney's read English?

3  
4 The second paragraph proves James Shipley, Grant Stockton, Melissa

5  
6 McKibben, Joseph Pickels Hannah Dahlen either don't understand English,

7  
8 are dumb attorneys OR deliberately causing massive pain BY ADA by 42 U.S.

9  
10 Code § 12101 to disabled Appellant.

11  
12 1. "From the Motion, it would appear Appellant is seeking to exclude"  
13 Should Appellant disparage Respondents filing saying "it would  
14 appear?  
15

16  
17 2. "Perhaps this is due to an untimely request for the transcript from  
18 Appellant and, as a result, he seeks to exclude the transcript in its  
19 entirety.  
20  
21

22 a. Firstly, Appellant is broke disabled and can't work. Appellant  
23 can't pay court fees and has them waived.

24 b. Secondly, "Or perhaps Appellant does not like what the  
25 transcript ultimately reveals." Appellant however, welcomes  
26 the transcripts if respondents want to pay for it. The transcripts  
27 will clearly show untruthful statements of Defendants and their  
28 Attorneys. Also untruthful statements of the Judge. In addition,  
29 it will show the defendants illegally included the 21DR02783  
30 docket which was under modification because the Presiding

1 Judge knew of dishonest unethical Judge Baileys collusion  
2 with Respondent Shipley.  
3 [https://thelawisyourattorney.com/sample-page/unethical-](https://thelawisyourattorney.com/sample-page/unethical-judge-bailey/)  
4 [judge-bailey/](https://thelawisyourattorney.com/sample-page/unethical-judge-bailey/)

- 5 a. ORS 161.450 says it is a Felony of Defendants to conspire to  
6 include the fraudulent dissolution into this case.
- 7 b. In addition, by ORCP 28 - Joinder of parties it was illegal for  
8 Shipley and Stockton to bring up anything about the divorce  
9 without my as plaintiffs permission. Therefore, the Order  
10 attached is illegal and must be vacated. And By Previous  
11 prosecution cant be filed again.

12 Third paragraph.

13  
14 “Any way it is split, Respondent Shipley objects to Appellant’s Motion.  
15 Appellant has filed an appeal. Accordingly, the Circuit Court record,  
16 including any transcripts from Court hearings, are in play. Lastly, due to the  
17 irregularity and confusion raised by Appellant’s Motion, for preservation  
18 purposes Respondent Shipley objects to each and every claim for relief  
19 raised in Appellant’s Motion”.

20  
21 The third paragraph proves James Shipley, Grant Stockton, Melissa

22  
23 McKibben, Joseph Pickels Hannah Dahlen either don’t understand English,

24  
25 are dumb attorneys OR deliberately causing massive pain BY ADA by 42 U.S.

26  
27 Code § 12101 to disabled Appellant.

- 28  
29 1. “Any way it is split, Respondent Shipley objects to Appellant’s Motion.  
30 Appellant has filed an appeal. Accordingly, the Circuit Court record,  
31 including any transcripts from Court hearings, are in play”.

1 Respondent Shipley can object but The Appeals Court can see right  
2 through their untruthful statements. The Circuit Court record, including  
3 any transcripts from Court hearings, are in not play unless the  
4 Appeals court orders that and Respondents pay for it.

5 2. Lastly, due to the irregularity and confusion raised by Appellant's  
6 Motion, for preservation purposes Respondent Shipley objects to  
7 each and every claim for relief raised in Appellant's Motion".

8 a. Again can Respondent read English. Two small mistakes are now  
9 fixed and amended and will be refiled. Item 2. Is completely  
10 untrue.

11 The lower case was about an illegal Lis Pendens filed on August 4<sup>th</sup> 2022 on

12  
13 Appellants home title by R2 for R1. Appeal Attorney Jeff Smith for A179571

14  
15 asked PA to file court certified documents of the limited judgment to split the

16  
17 home value which said "Free of claim of Wife" and the final Judgement which

18  
19 said the Home was awarded to PA by the previous limited judgement. PA filed

20  
21 those at the Washington County Property Tax place and their Attorneys

22  
23 affirmed these to documents removed the illegal Lis Pendens. Then in

24  
25 October 2024 R1 through R2 filed in the title to remove the illegal Lis Pendens.

26  
27 Therefore, a tort case was filed as 25CV63661 to remove the court certified

1 documents from PA's home title on December 3<sup>rd</sup> 2025 and legally served to  
2  
3 Defendants. Then amended on December 5<sup>th</sup> 2025 because PA forgot to put a  
4  
5 "state of claim" in the original complaint. Again, legally served to R2 and R1.  
6  
7 R2 and R1 didn't appear until January 20<sup>th</sup> 2026 when PA sent by UTCR  
8  
9 5.100 a default summary judgement for comments. Instead R2 legal counsel  
10  
11 filed ORS 31.150 motion to strike non-applicable law. Therefore, only the  
12  
13 docket list is needed by the trial court. Appellant strongly designates only the  
14  
15 docket list trial court record.  
16  
17 In addition, D2 is an untruthful Attorney. In the lower case he filed non-  
18  
19 applicable law with a rule 21 pleading. In it he said"

As separately briefed by defendant James T. Shipley, Plaintiff seeks to punish Mr. Shipley and Julia White for lawful conduct commensurate with Julia White's prosecution of her rights in a dissolution of marriage proceeding. That right included filing a Notice of Lis Pendens against Plaintiff's real estate to protect and enforce her statutory rights arising out of both an award of spousal support and property, and the right to enforce the terms of the judgment by obtaining a Writ of Execution on personal property. James T. Shipley, in his capacity as attorney of record for Julia White, drafted and filed the Notice of Lis Pendens and all documents to lawfully obtain the Writ of Execution to protect his client. Ms. White relied upon the advice and practice of counsel. Ms. White is entitled to rely on the Anti-SLAP statute to the same ends as her attorney.

"  
The Writ of execution was illegal contempt of court by item 12 on page 11  
in the dissolution which said everything must be finished within 30 days.

12. NECESSARY DOCUMENTS: No later than thirty (30) days after signing this Judgment, each party shall execute or cause to be executed whatever documents are necessary to accomplish the terms of this Judgment; each party shall transfer or cause to be transferred all personal property awarded to the other party; and each party shall deliver to the other party all documents and records in that party's possession or control relating to all assets awarded to the other party.

The judgement signed on September 1<sup>st</sup> 2022. Nor was Appellants truthful testimony on July 26<sup>th</sup> 2022 in the final Shipley ruling of 21DR02783. The

1 illegal writ not filed until May 2023 several months late. The illegal prima  
2  
3 fascia case was filed two years later with more illegal collusion between  
4  
5 Judge Bailey and Mr. Shipley. The presiding Judge knows this and Judge  
6  
7 Bailey was recused from the prima fascia case and 21DR02783 dissolution  
8  
9 case which was changed to a modification. Judge Summers violated the  
10  
11 modification and ADA when in Appellants opening statement he told the  
12  
13 truth and Judge Summers illegally cut disable Appellants remote feed and  
14  
15 continue on with illegal exported collusion.  
16

## Case Information

21DR02783 | Julia Annette White vs David Charles White

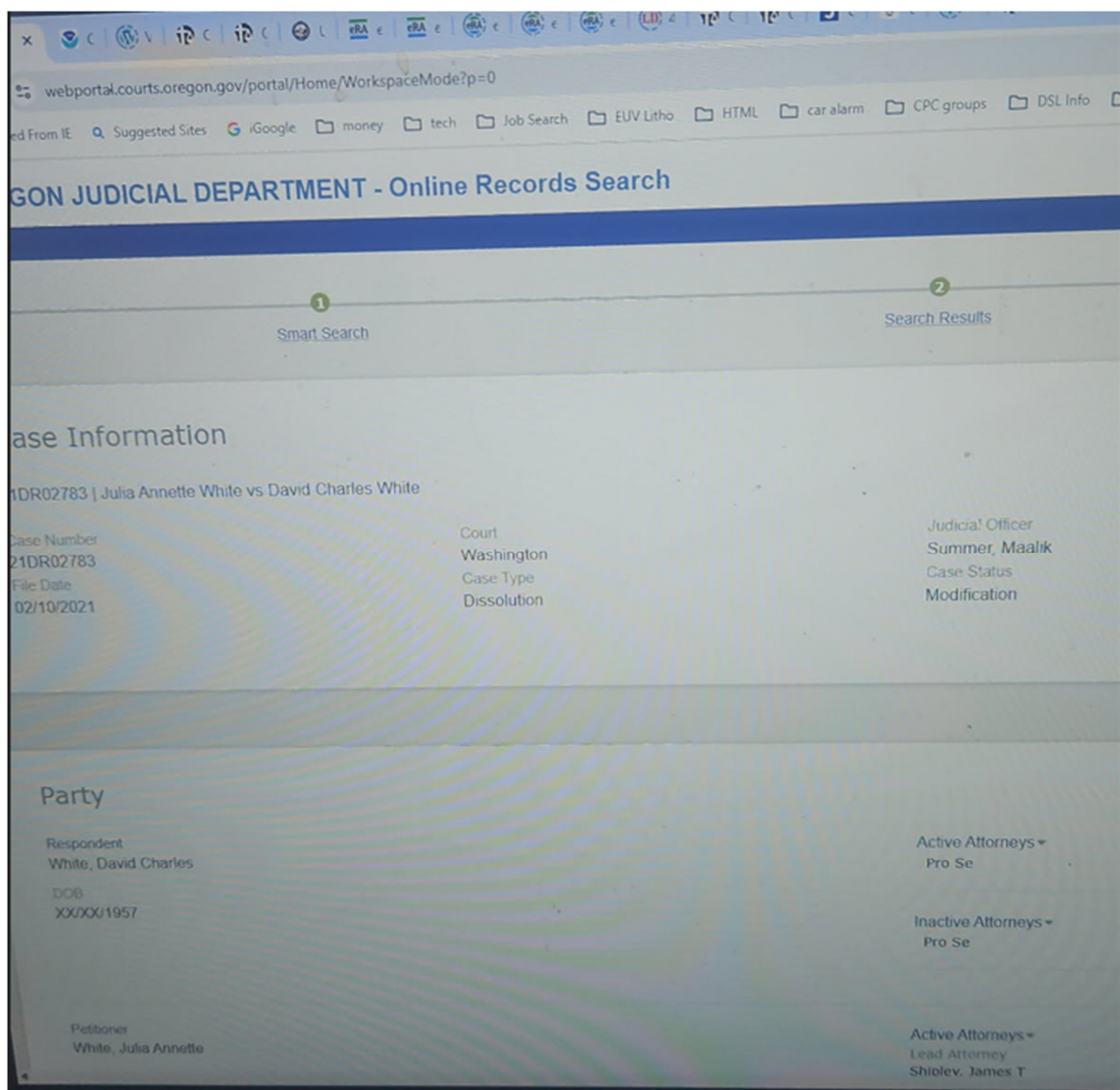
Case Number  
21DR02783  
File Date  
02/10/2021

Court  
Washington  
Case Type  
Dissolution

Judicial Officer  
Summer, Maalik  
Case Status  
Modification

17  
18  
19  
20 Judge Bailey knew since July 26<sup>th</sup> 2022 about PORs medical issue  
21  
22 and illegally in violation of ADA ignored it.  
23  
24

1



2

3

4

5

6

7

8

9

10

11

12

13

14

Transcripts of 21DR02783 Page **445** Lines 11 to 21. July 26<sup>th</sup> 2022

Judge Bailey's Court

THE COURT: Go ahead, Mr. White. What else do you want to tell me that will be helpful in me figuring out how to distribute the assets of this and whether to **determine spousal support for Ms. White?**

THE WITNESS: Okay. So I -- I explained what the law says that --

1 THE COURT: I'm familiar with the law.

2  
3 THE WITNESS: And you're familiar with the law and that I can't  
4  
5 pay spousal support. And also, I have a **medical issue**; that is  
6  
7 why I can't get another job. (**Bold added**).

8  
9 The red type clearly shows recused Judge Bailey's bias for Ms.  
10 White.

11  
12 Transcripts of 21DR02783 Page **494** Lines 11 to 17: July 2022  
13 Judge Baileys Court

14  
15 "Furthermore, as I said in my testimony, there's two -- two tests that  
16 fail

17  
18 for ORS 107.105. One is simply that I can't pay it. Christine from Rick

19  
20 Hug (phonetic) CPA testified to that. I put what my June expenses  
21  
22 were. So, if any spousal support is awarded, I'll be in contempt of  
23 Court

24  
25 immediately because I can't pay it.

26  
27 And that right there is plenty, according to this law, to keep me from  
28  
29 paying it. But secondly, I have a **medical issue** which prevents me  
30  
31 from getting a job [**Bold added**]."  
32

### 33 34 Conclusion

35  
36 This appeal presents a threshold procedural question: whether the lower  
37  
38 court proceeding was legally commenced and maintained when the

1  
2 defendants didn't appear within 30 days by the served subpoena. Appellant  
3  
4 respectfully asks the Court to resolve that question under the governing  
5  
6 Oregon service requirements, recognizing that legal boundaries are  
7  
8 important. Appellant contends that missing response deadlines can  
9  
10 severely harm his case. It can lead to dismissing the lawsuit, the Appellant  
11  
12 losing the right to present certain evidence, financial penalties, or facing  
13  
14 unfavorable rulings on key legal claims. This was all due to illegal bias of  
15  
16 the lower court believing untruthful non-applicable law of the Attorneys who  
17  
18 deserve sanctions by ORS 18.899. The same attorneys, James  
19  
20 Shipley, Grant Stockton, Melissa McKibben, Joseph Pickels  
21  
22 Hannah Dahlen violated ADA by 42 U.S. Code § 12101  
23  
24 Americans with Disabilities and must pay Disabled Appellant  
25

1 \$50,000 each and the sanctions for one year by ORS 18.899 for  
2  
3 clear evidence of ADA violations.  
4

### 5 **Excerpt from ADA 13) 42 U.S. Code § 12101**

6 The Congress finds that—

7 (3) discrimination against individuals with disabilities persists in such  
8 critical areas as employment, housing, public accommodations, education,  
9 transportation, communication, recreation, institutionalization, health  
10 services, voting, and access to public services;

11 (5) individuals with disabilities continually encounter various forms of  
12 discrimination, including outright intentional exclusion, the discriminatory  
13 effects of architectural, transportation, and communication barriers,  
14 overprotective rules and policies, failure to make modifications to existing  
15 facilities and practices, exclusionary qualification standards and criteria,  
16 segregation, and relegation to lesser services, programs, activities, benefits,  
17 jobs, or **other opportunities**; [Bold added]

### 18 **FINDINGS AND PURPOSES OF PUB. L. 110–325**

19 “(3) while Congress expected that the definition of disability under the ADA  
20 would be interpreted consistently with how courts had applied the definition  
21 of a handicapped individual under the Rehabilitation Act of 1973 [29 U.S.C.  
22 701 et seq.], **that expectation has not been fulfilled**; [bold added]  
23

### 24 **(2) Authority of court**

25 In a civil action under paragraph (1)(B), the court—

26 (A) may grant any equitable relief that such court considers to be  
27 appropriate, including, to the extent required by this subchapter—

28 (i) granting temporary, preliminary, or permanent relief;

### 29 **(5) Judicial consideration**

30 In a civil action under paragraph (1)(B), the court, when considering what  
31 amount of civil penalty, if any, is appropriate, shall give consideration to  
32 **any good faith effort or attempt to comply with this chapter by the**  
33 **entity**. In evaluating good faith, the court shall consider, among other  
34 factors it deems relevant, whether the entity could have reasonably  
35 anticipated the need for an appropriate type of auxiliary aid needed to

1 accommodate the unique needs of a particular individual with a  
2 disability.[ **Bold added**]

3 The attorneys have in no way offered a good faith apology or recognized  
4 Appellant's well-documented permanent medical disability. Therefore, they  
5 have consistency violated "any good faith effort or attempt to comply with  
6 this chapter by the entity". I "This even though the Presiding Judge in  
7 Washington County has registered Appellant as ADA in every instance,  
8 Appellant has endured persistent discrimination from these Attorneys by  
9 ADA 42 U.S. Code § 12101 5: other opportunities; also 3: public  
10 accommodations.

### 11 **§12202. State immunity**

12 **A State shall not be immune under the eleventh amendment to the**  
13 **Constitution** of the United States from an action in <sup>1</sup> Federal or State court  
14 of competent jurisdiction for a violation of this chapter. In any action against  
15 a State for a violation of the requirements of this chapter, remedies  
16 (including remedies both at law and in equity) are available for such a  
17 violation to the same extent as such remedies are available for such a  
18 violation in an action against any public or private entity other than a State.  
19 **[Bold Added]**

20  
21 The ADA requires a payment of \$50,000 for first violation, \$100,000 for  
22  
23 second violation and Judicial discretion for additional violations. Therefore,  
24  
25 the \$50,000 ask and sanctions against these attorneys is well within State  
26  
27 disabilities laws which mirror federal ADA law.

### 28 **PRAYER FOR RELIEF**

30  
31 WHEREFORE, Appellant respectfully requests that the Court determine  
32  
33 that the service was legally sufficient and therefore R1 and R2  
34

1 appearance untimely.

2  
3 Appellant respectfully requests that the Court to wave the transcripts

4  
5 because they are not needed and broke disabled Appellant cant pay for

6  
7 them.

8  
9  
10 Specifically:

11  
12 1. Appellant respectfully requests that the Appeals Court rule the docket

13  
14 list from the lower court is all that is needed.

15  
16 2. Appellant respectfully requests that the Appeals Court rule only the

17  
18 docket list and Appellants exhibits in the opening brief are to be

19  
20 considered by the Appeals Court. Appellant respectfully requests this

21  
22 relief in item two is granted as soon as possible.

23  
24 3. Appellant respectfully requests that the Court to file sanctions for 1

25  
26 year against attorneys, James Shipley, Grant Stockton,

27  
28 Melissa McKibben, Joseph Pickels Hannah Dahlen for

1  
2 violation of ADA in this docket and lower case docket.

- 3  
4 4. Appellant respectfully requests that the Court to order attorneys listed  
5  
6  
7 to pay Appellant \$50,000 each against attorneys, James Shipley,  
8  
9 Grant Stockton, Melissa McKibben, Joseph Pickels Hannah  
10  
11 Dahlen for Violation of ADA by 42 U.S. Code § 12101 in this  
12  
13 docket and lower case docket. Appellant further requests such  
14  
15 other relief as the Court deems just and lawful.

16  
17  
18 CERTIFICATE OF FILING

19  
20 I certify that on 09/10/2026, Appellant filed the Wave Transcripts in  
21  
22 docket A191709 with the State Court Administrator at the following  
23  
24 address:

25  
26 by the following method of filing:

27 X Electronic Filing through the court's eFiling system

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30 DATE: 09/10/2026  
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ORAP 5.05 (2) certificate

(i) The brief complies with the word-count limitation in paragraph (1)(b) of this subsection by indicating the number of words in the brief. The person preparing the certificate may rely on the word count of the word processing system used to prepare the brief. If the attorney, or a self-represented party, does not have access to a word-processing system that provides a word count, the certificate must indicate that the attorney, or self-represented party, does not have access to such a system and that the brief complies with paragraph (1)(c) of this subsection.

The original brief must include a certificate of compliance with brief length and type size requirements of ORAP 5.05(4)(f) (minimum 14 point for proportionally spaced type). You must also certify that the brief complies with the brief length requirements of ORAP 5.05(2), either by word count or, if you don't have access to a word-processing system that provides a word count, by page limit. You must sign the certificate; your signature attests that the brief in fact complies with those requirements. The certificate shall immediately precede or be on the same page as the proof of service.

Brief complies with 14-type font.

Word count 3910 Maximum 5000

Page count 30.

CERTIFICATE OF SERVICE

I certify that on 09/10/2026, Appellant served a true copy of the

amended notice of appeal to the following parties at the addresses

set forth below.

**TRIAL COURT ADMINISTRATOR: TRIAL COURT ADDRESS**

Washington County Court

[wsh.transcriptcoordinator@ojd.state.or.us](mailto:wsh.transcriptcoordinator@ojd.state.or.us)

Washington County

150 N 1<sup>st</sup> Ave MS 37 Hillsboro

97124

1                   **TRANSCRIPT COORDINATOR: TRIAL COURT ADDRESS**

2  
3                   Washington County Court  
4                   [wsh.transcriptcoordinator@ojd.state.or.us](mailto:wsh.transcriptcoordinator@ojd.state.or.us)  
5                   Washington County  
6                   150 N 1<sup>st</sup> Ave MS 37 Hillsboro 97124

7  
8  
9                   R1: Julia White [good4thesoul@gmail.com](mailto:good4thesoul@gmail.com). R2 jclygo@lygoshipley.com

10  
11                   **METHOD OF SERVICE**

12                   X U. S. Mail when printer is fixed.  
13                   X e filed and emailed by the email service  
14                   ofthelawisyourattorney.com. ORCP 9C (3) and g service by email  
15                   for any court pleading is legal in Oregon.  
16

17                   **The email service is accepted as legal service by these courts.**

18                   **Jackson County Courts**

19                   **Yamhill County Courts**

20                   **Washington County Courts**

21                   **Oregon Appeals Court**

22                   **Oregon Supreme Court.**

23                   **Federal Courts**

24                   **Federal Appeals Court**

25                   **US Supreme Court**  
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27                   Leland Dale Jossy 09/10/2026  
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31                   Exhibit One Legal request not needed and harassment of Attorneys.

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33                   Appellant bets less than 30% of Appeals have these requests. The

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35                   response was filed Friday September 4<sup>th</sup> 2026. Another ADA Violation.

Attorneys at Law  
P.O. BOX 567  
HILLSBORO, OREGON 97123  
PHONE (503) 648-6677 • FACSIMILE (503) 648-1091

September 2, 2026

**VIA CERTIFIED MAIL & EMAIL –**  
**[professordavewhite@gmail.com](mailto:professordavewhite@gmail.com)**  
**[research@cctruth.org](mailto:research@cctruth.org)**

Mr. David White  
18965 NW Illahee St  
Portland, OR 97229

Re: Appellate Case No. A191709  
*White v. White*

Dear Mr. White:

As you know, I will be the attorney in this office handling the appeal on behalf of Defendant, James Shipley. Please make sure from this point forward to direct all correspondence in this matter to my attention.

Please file, within the next 10 days, the \$500 cost undertaking required by ORS 19.300(1). If such is not filed within that time, I will file a motion with the court to dismiss the appeal pursuant to ORAP 7.40.

Regards,

*/s/ Joseph A. Pickels*

Joseph A. Pickels  
jap@brisbeeandstockton.com  
JAP:hd

Exhibit two. Mr. Shipley's untruthful denial of wave transcripts motion  
Appellant filed. Violation of ADA as well.

IN THE COURT OF APPEALS OF THE STATE OF OREGON

DAVID WHITE,

Plaintiff-Appellant,

v.

JULIA ANNETTE WHITE; JAMES SHIPLEY,

Defendants-Respondents.

Washington County Circuit Court  
No. 25CV63661

A191709

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**DEFENDANT-RESPONDENT SHIPLEY'S  
RESPONSE TO APPELLANT'S "WAIVE TRANSCRIPTS MOTION"**

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Respondent Shipley, through his Counsel, received Appellant's apparent Motion to Waive the transcript from the Circuit Court to this appeal.

In the first instance, it remains unclear what exactly Appellant is appealing from the Circuit Court. In the second instance, it is unclear what exactly Appellant is seeking in filing this Motion. If Appellant is seeking to exclude the transcript from

Circuit Court before this Court, Respondent Shipley objects.

From the Motion, it would appear Appellant is seeking to exclude everything in the Circuit Court record after the Complaint was filed. Perhaps this is due to an

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untimely request for the transcript from Appellant and, as a result, he seeks to exclude the transcript in its entirety. Or perhaps Appellant does not like what the transcript ultimately reveals.

Any way it is split, Respondent Shipley objects to Appellant's Motion. Appellant has filed an appeal. Accordingly, the Circuit Court record, including any transcripts from Court hearings, are in play. Lastly, due to the irregularity and confusion raised by Appellant's Motion, for preservation purposes Respondent Shipley objects to each and every claim for relief raised in Appellant's Motion.

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**DATED** this 1<sup>st</sup> day of September, 2026.

BRISBEE & STOCKTON LLC

By: /s/ Joseph A. Pickels  
Joseph A. Pickels, OSB #194920  
jap@brisbeeandstockton.com  
Of Attorneys for Defendant-Respondent  
Shipley