**UNITED STATES DISTRICT COURT**

**DISTRICT OF MINNESOTA**

**Kellye Strickland,**

Plaintiff,

v.

**Ramsey County, et al.,**

Defendants.

**Civil Action No. 0:25-cv-02056-DWF-DJF**

# PLAINTIFF'S MEMORANDUM IN OPPOSITION TO JUDICIARY DEFENDANTS' MOTION TO DISMISS

## INTRODUCTION

The Judiciary Defendants seek dismissal by invoking Rooker–Feldman, Younger, and absolute judicial immunity. Their memorandum runs 27 pages of narrative, case law, and repetition. Yet their argument rests on a single premise: that Plaintiff's claims are nothing more than dissatisfaction with a state harassment restraining order.

That framing is false.

Plaintiff's claims are not an appeal of a state court judgment. They are claims of fraud, retaliation, denial of ADA accommodations, and document tampering. The judiciary defendants acted (1) in the complete absence of jurisdiction, (2) through non-judicial,

administrative misconduct, and (3) in bad faith retaliation after Plaintiff filed a federal civil rights action.

Judicial immunity was developed to protect judges from retaliatory lawsuits by disgruntled litigants. But here it is being used as a sword by judicial officers themselves—to retaliate against a disabled autistic woman, residing out of state, who had no connection to these officials until they manufactured authority through unsigned orders, false service records, and retroactive signatures. Immunity does not—and must not—extend that far.

For these reasons, the motion should be denied.

## STATEMENT OF FACTS

### A. Repeated Petitions Without Service

Between July and August 2024, Petitioner Madeline Lee filed five duplicative HRO petitions against Plaintiff. The petitions were repeatedly rejected for failing to allege statutory harassment under Minn. Stat. § 609.748. No ex parte relief was granted. The only allegations ever raised were:

That Plaintiff made a good-faith CPS report;

That Plaintiff posted online criticism; and

That Plaintiff used a non-residential mailing address for safety.

These do not constitute harassment under Minnesota law, and the repeated re-filings demonstrate that even the state court recognized the deficiency.

Despite this, hearings were repeatedly scheduled and continued for lack of service. Affidavits filed by the Merrimack County Sheriff (Aug. 29, 2024) and the Maricopa County Sheriff (Oct. 2, 2024) confirmed non-service. Returned mail in November and December further established Plaintiff was not served.

**B. Default Order Without Jurisdiction**

On December 12, 2024, Referee Elizabeth Clysdale entered a default HRO without Plaintiff's knowledge or participation. The order was initially unsigned and later "countersigned" by a judge with altered timestamps.

Mason's memo portrays this as a valid judicial act. But jurisdiction had not attached: service was not completed until February 27, 2025, when Maricopa Deputy David Sheets finally served Plaintiff in Tempe, Arizona. Every order prior to that date was void ab initio.

**C. Post-Service Retaliation and Denial of Rights**

After actual service, Plaintiff acted immediately:

March 6, 2025 – Filed a Motion to Rescind within the 20-day statutory window. The court denied it on April 11, falsely claiming Plaintiff had been served by mail on November 7, 2024.

That same day, Referee Rossow relied on the fabricated November service date, ignoring sworn non-service affidavits.

Plaintiff's parallel filings (a defamation suit and an HRO petition against Lee) were buried without docketing, while her husband's nearly identical petition was processed, granted ex parte, and scheduled.

This disparate treatment shows discriminatory obstruction, not neutral adjudication.

**D. May 23, 2025 Hearing – Barred from Evidence**

At the contested May 23 hearing on Plaintiff's Motion to Vacate, Referee Jenese Larmouth expressly barred Plaintiff from presenting service evidence:

"This is not an evidentiary hearing. It is a motion hearing only."

Larmouth denied the motion, upheld the void HRO, and falsely framed Plaintiff's protective address choice as "evasion." This denial of a meaningful forum undermines Mason's Younger argument — the state court explicitly refused to adjudicate jurisdictional defects.

**E. Altered Documents and Retroactive Signatures**

Plaintiff later discovered through records requests that 11 court orders were issued without judicial signatures; at least 7 were later altered to add signatures without notation.

Additionally:

On July 14, 2025, Ramsey County mailed a standard hearing notice.

On July 24, 2025, after Plaintiff filed recusal motions and spoliation notices, a materially altered duplicate was re-mailed. This second notice bore a stigmatizing "Domestic

Abuse/Harassment Office" label, a falsified "Filed July 24" stamp, and an obscured metadata block.

These are not judicial errors. They are administrative tampering designed to retaliate and conceal jurisdictional absence.

**F. ADA Failures and Retaliation by Staff**

Throughout 2025, Plaintiff disclosed her disabilities (Autism, PTSD, Bipolar, IIH) and requested accommodations. Court staff, especially Defendant Nicole Rueger:

Mocked Plaintiff's disability during intake,

Refused written communication despite documented panic attacks triggered by phone calls,

Selectively withheld or "dumped" records in fragmented, unindexed batches,

Mischaracterized ADA requests to deny them.

The ADA requires an interactive process. None was provided. Instead, accommodations were weaponized against Plaintiff as grounds for stigma and exclusion.

**G. Escalating Retaliation and Judicial Manipulation**

After Plaintiff filed this federal action on May 9, 2025, retaliation escalated:

Former Ramsey County prosecutor Kyle Manderfeld entered the state case as opposing counsel on May 12 without disclosing his prior employment.

On July 31, 2025, Referee Larmouth recused only after being named a defendant, but issued misleading "Findings of Fact" denying evidence of Plaintiff's federal case.

On August 1, 2025, Judge Nicole Starr was suddenly assigned, and the TylerTech record system was retroactively modified to list her as presiding over earlier hearings she never attended.

On August 19, 2025, Judge Starr denied Plaintiff's renewed motion to vacate solely on collateral estoppel, refusing to address service defects or document tampering.

**H. Summary**

The record shows:

Jurisdiction never attached until Feb. 27, 2025.

Orders were issued without signatures and later altered.

Plaintiff was barred from evidentiary presentation.

ADA rights were denied, mocked, and retaliated against.

After Plaintiff filed federally, retaliation escalated through altered notices, stigmatizing labels, and judicial reassignment.

These facts demonstrate systemic fraud and retaliation, not mere judicial error. Judicial immunity cannot shield document tampering, fabricated service records, or retaliatory ADA violations.

**LEGAL ARGUMENT**

**I. Rooker–Feldman Does Not Apply**

**Defendants' Argument**

The Judiciary Defendants argue that all of Plaintiff's claims are barred by the Rooker–Feldman doctrine because she is "seeking to vacate the HRO" and thereby collaterally attacking a state court judgment.

**Response**

This argument misstates both the law and the relief sought.

The Supreme Court has strictly confined Rooker–Feldman to "cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments." *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005). The doctrine does not bar independent federal claims simply because they involve the same factual background as a state proceeding. *Skinner v. Switzer*, 562 U.S. 521, 532 (2011).

**Here, Plaintiff's claims are independent. They include:**

Denial of ADA rights — repeated refusals to engage in the interactive process, mocking of disability, denial of accommodation requests.

Record tampering — issuance of unsigned orders, later altered with retroactive judicial signatures and falsified metadata.

Denial of access to courts — suppression of filings, mislabeling of timely filings as "frivolous," and obstruction of post-service motions.

Retaliation — escalation of misconduct after Plaintiff filed this federal suit, including stigmatizing return addresses, altered hearing notices, and improper reassignment of judicial officers.

These harms exist regardless of whether the HRO stands. They are actionable constitutional and statutory violations that federal courts are fully empowered to address.

**Distinguishing Their Cases**

Defendants rely heavily on prior Minnesota HRO cases, none of which controls here:

*Fredin v. Middlecamp,* 2018 WL 4616456 (D. Minn. 2018) – barred a collateral attack on HROs where plaintiff simply sought reversal of state judgments. Unlike *Fredin*, Plaintiff here alleges extrajudicial fraud, ADA retaliation, and document alteration. These are independent injuries, not dissatisfaction with rulings.

*Fredin v. Clysdale,* 2018 WL 7020186 (D. Minn. 2018) – dismissed a straightforward collateral challenge. In contrast, jurisdiction here was never established. Service did not occur until February 27, 2025, more than two months after the HRO issued. Orders entered without service are void ab initio. See *Pennoyer v. Neff*, 95 U.S. 714, 732–33 (1878).

*Yennie v. Walters,* 2018 WL 7137847 (D. Minn. 2018) – involved a plaintiff seeking to vacate HROs through federal court. Plaintiff here seeks redress for fraudulent tampering, ADA denials, and retaliation. Whether the HRO is ultimately vacated in state court has no bearing on the existence of these federal violations.

*Sayen v. Shurrer,* 2019 WL 2424049 (D. Minn. 2019) – abstention applied where the plaintiff could raise claims in state court. Here, Plaintiff was explicitly denied the ability to raise jurisdictional arguments, with the referee stating: *"This is not an evidentiary hearing."*

**Federalism and Exhaustion of Remedies**

Plaintiff is not forum-shopping. She is exhausting all available avenues of redress:

In state court, she has appealed and filed motions to vacate.

In federal court, she raises constitutional and ADA claims that the state forum has proven unwilling to adjudicate.

This is exactly the circumstance in which parallel state and federal litigation is permitted. See *Exxon Mobil*, 544 U.S. at 292 (parallel state and federal proceedings do not trigger Rooker–Feldman).

Even if the state appellate courts eventually address the validity of the HRO, that would not resolve the vast body of misconduct alleged here: document tampering, ADA retaliation, denial of court access, and post-federal-filing retaliation. These are independent federal claims that survive regardless of what happens to the HRO.

**Conclusion on Rooker–Feldman**

The Judiciary Defendants attempt to recast every claim as an appeal of the HRO. That is false. Plaintiff seeks redress for constitutional and statutory violations that exist apart from the HRO's validity. The federal courts retain jurisdiction to adjudicate those claims. Dismissal under Rooker–Feldman would be improper.

**IIII. Younger Abstention Does Not Apply**

**Defendants' Argument**

Defendants argue that federal jurisdiction is barred under the Younger abstention doctrine because Plaintiff's state HRO case is ongoing, involves state interests, and therefore must proceed without federal interference.

**Response**

That argument misstates both the doctrine and the facts.

The Supreme Court has made clear that Younger abstention is "the exception, not the rule." *Sprint Communications, Inc. v. Jacobs*, 571 U.S. 69, 81 (2013). Abstention applies only when three elements are satisfied:

There is an ongoing state proceeding;

The proceeding implicates important state interests; and

The state forum provides an adequate opportunity to raise constitutional claims. *Tony Alamo Christian Ministries v. Selig*, 664 F.3d 1245, 1249 (8th Cir. 2012).

The third requirement is absent here.

At the May 23, 2025 hearing on Plaintiff's Motion to Vacate, Referee Larmouth expressly barred Plaintiff from introducing evidence of non-service, declaring:

"This is not an evidentiary hearing. It is a motion hearing only." (Exhibit A, Hearing Transcript, p. 3)

This statement is dispositive: Plaintiff was denied any meaningful opportunity to litigate her core federal claim — that jurisdiction never attached because service did not occur until February 27, 2025. A forum that refuses to hear constitutional objections is not an "adequate" forum under Younger. See *Gibson v. Berryhill*, 411 U.S. 564, 577 (1973) (Younger does not apply where state proceedings are biased or constitutionally inadequate).

**The Bad Faith Exception Applies**

Even if the formal elements of Younger were present, the doctrine does not apply where state proceedings are pursued in bad faith, for purposes of harassment, or under flagrantly unconstitutional circumstances. *Younger v. Harris*, 401 U.S. 37, 54 (1971). Here, the record demonstrates precisely that:

Fabricated service – substitute service was approved to addresses already documented as invalid.

Altered orders – unsigned orders were later modified to add judicial signatures, and July 14/24 notices were reissued with falsified metadata and stigmatizing labels.

Retaliatory findings – Larmouth's July 31 "Findings of Fact" falsely stated Plaintiff had not submitted evidence of her federal case.

Escalation after federal filing – retaliation intensified after Plaintiff filed this lawsuit, including improper reassignment of Judge Starr and reliance on collateral estoppel to avoid addressing jurisdiction (Exhibit B, Findings of Fact, p. 4) .

These are not the hallmarks of legitimate state adjudication; they are acts of bad faith harassment.

**Distinguishing Their Cases**

Defendants cite *Sayen v. Shurrer*, 2019 WL 2424049 (D. Minn. 2019), and *Yennie v. Walters*, 2018 WL 7137847 (D. Minn. 2018). Neither applies here.

*Sayen* – abstention applied because the plaintiff could present constitutional claims in state court. Here, Plaintiff was explicitly barred from presenting service evidence, and referees misrepresented the existence of her federal case. That is not an "adequate opportunity."

*Yennie* – involved a plaintiff seeking to dismiss a criminal prosecution related to HROs. Here, Plaintiff does not seek to terminate state proceedings but to redress independent injuries: ADA retaliation, document tampering, and denial of access to courts. These harms exist regardless of the HRO.

**Parallel Remedies Are Permitted**

Federal courts have long recognized that abstention does not require a disabled litigant to abandon federal remedies merely because a related state case is ongoing. Plaintiff is not duplicating appeals; she is exhausting all lawful remedies in every forum available — state and federal. That is precisely how federal rights are preserved. *Exxon Mobil Corp.*, 544 U.S. at 292 (parallel litigation in state and federal court does not trigger abstention).

Even if state appellate courts ultimately address the HRO's validity, they cannot resolve the federal statutory and constitutional violations — ADA denials, retaliation for filing in federal court, and tampering with court documents. Those claims remain within this Court's jurisdiction and cannot be displaced by Younger.

**Conclusion on Younger**

Because Plaintiff has been denied any meaningful opportunity to raise constitutional claims in state court, and because the state proceedings are pursued in bad faith, Younger abstention is inapplicable. Federal jurisdiction is proper, and dismissal on this ground would be error.

**IIII. Judicial and Quasi-Judicial Immunity Do Not Apply**

**Defendants' Argument**

Defendants contend that all actions alleged by Plaintiff were judicial or quasi-judicial in nature, and thus are absolutely immune from liability.

**Response**

That is incorrect. Judicial immunity is not absolute. It does not extend to acts (1) taken in the complete absence of jurisdiction, or (2) that are non-judicial or administrative in nature. *Mireles v. Waco*, 502 U.S. 9, 11–12 (1991). Both exceptions apply here.

**A. Absence of Jurisdiction**

The referees and court staff acted in the total absence of jurisdiction over both Plaintiff's person and the subject matter.

Personal Jurisdiction. Service was not completed until February 27, 2025. Yet orders were entered as early as December 12, 2024, two months before jurisdiction attached. Orders entered without service are void ab initio. This has been the law since *Pennoyer v. Neff*, 95 U.S. 714, 732–33 (1878), which held that a judgment without valid service is a nullity. That principle has never changed. In *Peralta v. Heights Med. Ctr., Inc.*, 485 U.S. 80, 84–86 (1988), the Court reaffirmed that a judgment entered without notice and service violates due process and is void, even if the defendant cannot prove prejudice. Likewise, *Burnham v. Superior Court*, 495 U.S. 604, 608–09 (1990), confirmed that personal service remains the constitutional foundation of jurisdiction. In short: from *Pennoyer* to *Burnham*, the rule is the same — no service, no jurisdiction, no valid order. Judicial immunity vanishes when jurisdiction is absent. *Bradley v. Fisher*, 80 U.S. 335 (1871).

Subject Matter Jurisdiction. Minn. Stat. § 609.748 authorizes issuance of an HRO only where the petition alleges "repeated intrusive acts" constituting harassment. None of Lee's five petitions met this statutory threshold. Speech, criticism, and a good-faith CPS report are not statutory harassment. Without a qualifying allegation, the court had no power to act. Orders entered without subject matter jurisdiction are ultra vires and void. See *Stump v. Sparkman*, 435 U.S. 349, 356–57 (1978) (recognizing limits when jurisdiction is wholly absent).

Awareness of Invalidity. The Judiciary Defendants knew jurisdiction was lacking. That is why they engaged in a cover-up: issuing unsigned orders, then later altering them to add signatures and conceal metadata. The very act of alteration demonstrates consciousness that the original orders were legally invalid. If they believed their acts were protected by jurisdiction and immunity, there would have been no need to falsify signatures after the fact.

**B. Non-Judicial, Administrative Misconduct**

Even if jurisdiction had existed, much of the misconduct alleged here was not judicial at all:

Unsigned Orders Altered Post Hoc: Court staff and referees issued orders without judicial signatures, then later reissued them with falsified signatures and obscured metadata. This is record tampering, not adjudication.

Nicole Starr "Backfill" Assignment: Judge Starr was assigned after the fact, and the case management system was retroactively modified to list her as presiding over earlier hearings. That was an administrative cover-up, not a judicial act.

Rueger's Conduct: Defendant Rueger mocked Plaintiff's disability, obstructed filings, and selectively withheld records. These were administrative acts, not "integral to the judicial function."

Such acts fall outside immunity. *Forrester v. White*, 484 U.S. 219, 229 (1988) (employment retaliation not judicial); *Robinson v. Freeze*, 15 F.3d 107 (8th Cir. 1994) (administrative retaliation not protected).

**C. Judicial Immunity Is Not Absolute**

Defendants portray immunity as a blanket defense. It is not. Courts have repeatedly refused to apply immunity where judges step outside their role:

*Pulliam v. Allen*, 466 U.S. 522 (1984) – judicial immunity does not bar injunctive relief.

*Harris v. Harvey*, 605 F.2d 330 (7th Cir. 1979) – judge not immune for extrajudicial smear campaign against plaintiff.

*Martinez v. Winner*, 771 F.2d 424 (10th Cir. 1985) – immunity lost where judge conspired with prosecutors.

Here, referees and court staff went further: they actively tampered with records and retroactively altered judicial assignments to shield themselves from liability. These are not judicial functions — they are cover-up operations.

**D. Policy Consideration**

Judicial immunity was designed as a shield: to protect officers of the court from retaliation by disappointed litigants. It was never designed as a sword: a tool for judicial officers themselves to retaliate against litigants.

Yet that is what happened here. Plaintiff is a disabled, autistic woman residing in Arizona, with no connection to Ramsey County. Defendants had to manufacture authority to act against her: authorizing service to addresses they knew were invalid, entering orders unsigned, and later falsifying signatures once the defects were exposed. If immunity is stretched to cover such conduct, it would license judicial officers to abuse disabled litigants without accountability, secure in the knowledge that they could forge records later and call the misconduct "judicial acts." That outcome is irreconcilable with *Forrester*'s warning that immunity must remain narrow enough to preserve accountability.

The very existence of altered documents — unsigned orders later "fixed" with false signatures, and Judge Starr's retroactive assignment — proves that the referees knew they were outside immunity. A judge confident her orders were valid does not falsify signatures after the fact. Cover-up is evidence of guilty knowledge.

**Conclusion on Immunity**

The Judiciary Defendants acted without jurisdiction, outside judicial capacity, and in retaliatory bad faith. Judicial and quasi-judicial immunity do not extend to:

Orders entered before service, where no jurisdiction existed;

Administrative misconduct such as falsifying signatures, backdating orders, and retroactive assignments; and

Retaliation against a disabled litigant through ADA denials and procedural obstruction.

Immunity cannot be invoked to shield document tampering, falsification of orders, and retaliation against a vulnerable litigant. To allow dismissal here would convert immunity into a license for abuse — precisely what precedent forbids.

## IV. Lack of Subject Matter Jurisdiction Under Minn. Stat. § 609.748

### Statutory Standard

Minnesota's harassment restraining order statute is strictly limited. A court only has subject matter jurisdiction if the petition alleges:

"repeated incidents of intrusive or unwanted acts, words, or gestures that have a substantial adverse effect on the safety, security, or privacy of another."

— Minn. Stat. § 609.748, subd. 1(a)(1).

Without allegations that meet this threshold, the court lacks authority to proceed. Subject matter jurisdiction is not a pleading defect that can be waived or overlooked; it is a constitutional prerequisite. *Bradley v. Fisher*, 80 U.S. 335, 351–52 (1871); *Stump v. Sparkman*, 435 U.S. 349, 356–57 (1978). Orders entered in the absence of jurisdiction are void ab initio.

### Lee's Petitions Failed to Invoke Jurisdiction

Across five separate filings, Petitioner Madeline Lee never alleged conduct that qualifies as statutory harassment:

CPS Report – Plaintiff's good-faith child protection report was a privileged act under Minnesota law and cannot constitute harassment as a matter of law.

Speech and Criticism – Online statements, public criticism, and disputes over reputation may be the basis for a defamation claim, but they are not "harassment" under § 609.748.

Protective Mailing Address – Plaintiff used a non-residential address for safety when sending a cease-and-desist letter. Choosing a protective address does not create jurisdiction to issue an HRO.

Notably, despite five petitions, no ex parte order was ever granted. If the allegations had satisfied the statutory definition of harassment, the referees could have issued an immediate order. Instead, the state court repeatedly declined, continued hearings, and eventually entered an HRO only by default on December 12, 2024 — after four failed service attempts and no appearance by Plaintiff.

The Sequence Confirms Jurisdiction Was Absent

The procedural history confirms the jurisdictional defect:

August 29, 2024: Merrimack County Sheriff affidavit of non-service.

October 2, 2024: Maricopa County Sheriff affidavit of non-service.

November–December 2024: Multiple returned mailings.

December 12, 2024: HRO entered by default despite absence of service.

February 27, 2025: Plaintiff first served in Arizona.

The fact that no ex parte order was granted, followed by a default order entered without jurisdiction, demonstrates the court was acting without statutory authority.

**Orders Issued Without Jurisdiction Are Void**

It is a bedrock principle that "[a] judgment entered without jurisdiction is a nullity." *Bradley*, 80 U.S. at 351–52. This applies with equal force to subject matter jurisdiction: where a statute does not authorize relief, the court has no power to act. *Stump*, 435 U.S. at 356–57.

Here, § 609.748 did not authorize relief on the allegations made, so the Ramsey County District Court lacked jurisdiction from the outset. Subsequent orders, including the December 12, 2024 HRO, are void ab initio and cannot be saved by later proceedings.

**Conclusion on Subject Matter Jurisdiction**

Because Lee's petitions never alleged statutory harassment, the Ramsey County District Court never acquired subject matter jurisdiction under § 609.748. The HRO and all related orders are void, not merely voidable. Judicial immunity does not extend to actions taken in the absence of subject matter jurisdiction.

**V. Official Capacity Clarification**

**Defendants' Argument**

Defendants argue that Plaintiff's § 1983 claims fail because state officials cannot be sued for damages in their official capacities under the Eleventh Amendment and *Will v. Michigan Dep't of State Police*, 491 U.S. 58, 71 (1989).

**Response**

This argument is a red herring. Plaintiff does not seek damages from the referees or staff in their official capacities. Rather:

Referees Clysdale, Larmouth, Rossow, and Elsmore are sued in their individual capacities for acts outside the judicial function and in the complete absence of jurisdiction. These include issuing unsigned orders, later altered with retroactive signatures, and suppressing jurisdictional challenges.

Defendant Rueger, the court's records supervisor, is sued in her individual capacity for obstructing access to records, mocking Plaintiff's disability, and retaliating against ADA requests. These are administrative, not judicial, functions.

Section 1983 expressly permits individual-capacity suits for damages. *Hafer v. Melo*, 502 U.S. 21, 31 (1991). When officials act outside their lawful authority — particularly when they fabricate records or retaliate against a litigant — they are personally liable under § 1983.

**Equitable Relief**

To the extent Plaintiff seeks equitable relief (injunctions, declaratory judgments), such claims are not barred. *Pulliam v. Allen*, 466 U.S. 522, 541–42 (1984) (judicial immunity does not bar prospective relief); *Ex parte Young*, 209 U.S. 123 (1908) (injunctive relief may be sought against state officials acting unconstitutionally). Thus, any official-capacity claims survive at least as to declaratory and injunctive relief.

**Conclusion**

Defendants' Eleventh Amendment argument does not apply. All claims for damages are asserted against the referees and Rueger in their individual capacities. Any official-

capacity components are limited to prospective equitable relief, which remains fully cognizable under § 1983.

**CONCLUSION**

Judicial immunity, abstention doctrines, and jurisdictional defenses exist to preserve judicial independence and respect for state courts. They were never intended to provide a license for retaliation, document tampering, or the manufacture of jurisdiction where none exists.

**Here, the Judiciary Defendants:**

Acted without jurisdiction — entering orders months before Plaintiff was ever served and on petitions that never alleged statutory harassment.

Engaged in administrative and retaliatory misconduct — mocking disability, obstructing filings, and suppressing ADA requests.

Altered court records — issuing unsigned orders, later adding signatures, falsifying metadata, and retroactively assigning judges to cover their tracks.

These acts are not "judicial functions." They are fraud, harassment, and retaliation cloaked in judicial robes. Allowing immunity to extend this far would invert its purpose: transforming it from a shield protecting judges from harassment into a weapon allowing judges to harass litigants with impunity.

Federal courts exist to provide relief precisely when state actors weaponize their authority to silence or retaliate against vulnerable individuals. Plaintiff is a disabled, out-

of-state litigant who was denied any meaningful opportunity to be heard in Minnesota's courts. To dismiss her claims at this stage would ratify misconduct and deprive her of any remedy.

**For these reasons, Plaintiff respectfully requests that this Court:**

Deny Judiciary Defendants' Motion to Dismiss;

Permit claims against Referees Clysdale, Larmouth, Rossow, and Elsmore to proceed;

Permit claims against Ramsey County and Defendant Rueger to proceed under *Monell* and 42 U.S.C. § 1983; and

Confirm that federal jurisdiction exists to hear these claims and provide the only meaningful remedy available.

Respectfully submitted,

/s/ Kellye Strickland

Pro Se Plaintiff