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MONTANA SIXTH JUDICIAL DISTRICT COURT PARK COUNTY

KATHLEEN RAKELA, CLARE)	Cause No. DV-17-150
PARKER, RUDY PARKER, EDWARD)	
DOBROWSKI)	
)	
Plaintiffs,)	Hon. Judge Brenda Gilbert
)	
vs.)	
)	
Glastonbury Landowners Association, Inc.,)	RESPONSE TO MOTION FOR
Glastonbury Landowners)	ORDER RESOLVING ORDER THAT
Association, Inc.'s Board of Directors,)	THIS LITIGATION VIOLATES ITS
Dennis Riley, Daniel Kehoe, Charlene)	DECLARATION OF VALERY A.
Murphy, Richard Johnson, Kevin Newby)	O'CONNELL AS A VEXATIOUS
Mark Seaver, Leo Keeler, individually,)	LITIGANT
and as Board Members.)	
)	
Defendants.)	

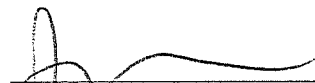
COMES NOW, Plaintiffs, and file this Response to Defendants' Motion for Order Resolving Order that this Litigation Violates its Declaration of Valery A. O'Connell as a Vexatious Litigant.

Plaintiff has never denied that Val O'Connell sent a letter to the GLA Board on October 10, 2017, outlining possible legal liability regarding the GLA's action when incumbent board members running against Kathleen voted to disqualify her from the ballot. Before Plaintiff, Kathleen Rakela had representation, she showed Val O'Connell's letter to former Judge, Nels Swandal. He concurred with the facts regarding the incumbent board members not recusing themselves from the vote to remove Kathleen from the ballot, as O'Connell had outlined in her

“letter” to the GLA Board. Ms. Rakela informed Val of Nels Swandal’s opinion. Plaintiff never relied on the facts in Ms. O’Connell’s “letter” until after she had a reputable legal opinion on its contents and then incorporated such legal argument to the Complaint. Plaintiff ‘s Attorney, Jami Rebsom, informed Defendants Counsel on February 8, 2018 (See Exhibit 1) by e-mail that Plaintiff had written the TRO and Complaint and not Ms. O’Connell. Also, on January 8, 2018, Plaintiff, Kathleen Rakela made a formal announcement to the GLA board that she had written the Complaint and TRO, not Val O’Connell. Later, on February 15, 2018 Jami Rebsom informed Seth Cunningham, once again, that Kathleen prepared her own pleadings (See Exhibit 2).

Even with all of this knowledge that Plaintiff refuted the GLA’s false claim at the January 8th GLA Board meeting, and with the assurance of attorney Rebsom to Seth Cunningham, the GLA continues to state the false claim that O’Connell wrote her TRO and Complaint in their February 2, 2018, “Motion for the Court to Consider ...” and in this new motion. Defendants have no grounds for pursuing Ms. O’Connell other than obtaining legal costs. Furthermore, counsel for Kathleen Rakela filed an Amended Complaint. Therefore, since Defendants counsel has been informed multiple times that the pleading were done by Plaintiff, Kathleen Rakela, and also in the Complaint filed, Plaintiff is requesting that Defendants pay her attorney fees due to the unnecessary time and energy spent by her attorney to respond to their motion.

DATED this 11 day of May, 2018.



Jami Rebsom
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

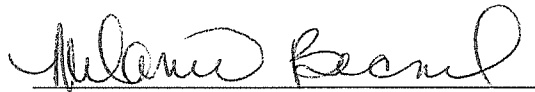
I hereby certify that I served a full, true and accurate copy of the foregoing document on the 11 day of May, 2018, to the following named person:

_____ by personal service

_____ by FAX to the following FAX number

X _____ by depositing a copy of same in the United States Mail, postage prepaid, and addressed as follows:

Seth Cunningham
Brown Law Firm
315 North 24th Street
Billings, MT 59103-0849



Melanie Becnel