

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

Robert Anderson
D/B/A Detroit Tubs

Hon. Richard Caretti
Case No. 2023-001402-CB .

Plaintiff,

v.

Nick Doelle, Individually Modern Paint and Design
OCEAN ROCK BATH, LLC, Defendants,

Robert Anderson
D/B/A Detroit Tubs
21537 Tanglewood
ST. Clair Shores, MI. 48082
586-344-3030

**PLAINTIFF'S MOTION TO COMPEL
DEFENDANT(S) TO ANSWER INTERROGATORIES OF**

**Red Barron Handyman and Construction LLC
Rick and Jeni Turnbull
Melissa Doelle**

AND

REQUEST FOR SANCTIONS AGAINST OPPOSING CONSEL

NOW COMES THE PLAINTIFF ROBERT ANDERSON'S PLAINTIFF'S MOTION
TO COMPEL AND FOR SANCTIONS AGAINST OPPOSING CONSEL.

1. On 12/18/2023 The court ordered discovery in this case

2. On 01/01/2024 Interrogatories were sent From Plaintiff to Defendant's Counsel and also electronically Filed in Mifile System.
3. In a follow up email The Plaintiff asked Defendant's counsel if sending in a MS Word document would be easier, No reply has been given since that date.
4. The Plaintiff requests that all defendants be required to answer all interrogatories within 14 days of the courts ruling.

REQUEST FOR SANCTIONS AGAINST OPPOSING CONSEL

1. On 11/19/2023 Defendant Doelle along with his counsel requested to seek a PERSONAL PROTECTION ORDER.
2. The PERSONAL PROTECTION ORDER intent was to stop The Plaintiff from representing himself and attempting to restrict more of his rights afforded by the constitution.
3. 01/08/2024 The Issue was heard and then denied after a hearing by Judge **Matthew Switalski** Case No. 2023-006916-ph
4. Doelle along with his Attorneys appeared in person, they requested a PERSONAL PROTECTION ORDER against Plaintiff. Referring to this case stating in open court, that this case is a form of harassment of Mr. Doelle. Also alleged large attorney fees that Doelle has incurred in this case.
5. The Plaintiff filed this case in the proper venue, based on a contract signed be Mr. Doelle, The Defendant's motion for summary disposition was denied by this court

6. These facts and any legal fees incurred, were solely caused by Mr. Doelle's Improper actions and are the basis of this litigation.
7. Seeking/Filing a PERSONAL PROTECTION ORDER is a abuses the rules of procedure, the judicial process.
8. On or about 04/03/2023, Doelle was advised by the Plaintiff he was going to uphold the signed non-compete contract. Whereas Doelle's reply was "why Bother" (Please SEE EX. A text messages exchange from Doelle and Plaintiff)
9. Please See Exhibits C-1 thru C-4 , emails from Mr. Robinson stating that I had illegally or improperly contacted Mr. Doelle. The plaintiff replied, and stated that the contact was not done by myself.
10. In the emails with Mr. Robinson it was explained that was done be a online networking site that I joined who then sent email to all of my contacts. Even with this information, they choose to request a personal protection, order improperly and abuse the Court system. Additionally according to the court clerk, the PPO was denied on November 17.
11. On December 1, 2023 in an email to Mr. Murphy and Mr. Robinson I reminded them that I have interrogatories that they have not responded to and also the parties that I wished to conduct discovery for.

Plaintiff Humbly requests this honorable court to Order ALL Parties above to answer interrogatories within 14 days of this court order.

Furthermore, that both Defendants lawyers be sanctioned of \$1,000 each for violating rules of procedure or for abusing the judicial process. For their part of improper use of the personal protection order. Lawyers should be held to a higher standard of conduct and simply should know better. They do not have facts or law so they attack the Plaintiff and attempt to pervert the law and to deprive the Plaintiff his rights as they have done before and is the topic of a Federal Case No.23-12071.

Sunday, January 21, 2024

A handwritten signature in cursive script, appearing to read "Robert Anderson".

ROBERT ANDERSON

EX.A

"Yeah this is Paul I'm calling about a work order I had placed in the October 21, 2022 I'd like to have you call me back cause we need to discuss _____ refund of my deposit [313-485-1184](tel:313-485-1184) unless you guys are out of business..."

Mon, Apr 3 at 5:37PM

Nice comment you left on my Facebook. I'd appreciate if you deleted that comment before Jeni sees it.

Why should I care who see it you non compete I will enforce remember to keep records of all the jobs you've done since I'll be contacting those people as well when we get to discovery

Why even waste your time Bob?

Because when I see you you'll have to defend that's why I'm gonna waste my time which is gonna cost you money that you don't have. Do you wanna be an asshole about it we're gonna do that.

Jeff and Carrollyn told me you'd fuck us over but I choose to disregard what they said

Jeff and Carollynn have nothing to do with any of this. What are you even defending?

Anything that you post I will comment on with truth anything or job that you have done since you've left my employment will be brought up in discovery and then I will sue those people as well

EX . B1

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STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

Nick Doelle,

Hon. Matthew Switalski
Case No. 2023-006916-ph

Petitioner / Plaintiff,

v.

Robert Anderson

Respondent /Defendants,

Robert Anderson PROPER
D/B/A Detroit Bathtubs
21537 Tanglewood
ST. Clair Shores, MI. 48082
586-344-3030

DEFENDANT’S OBJECTION
TO ENTRY OF PEPSONAL PROTECTION ORDER

NOW COMES THE DEFENDANT ROBERT ANDERSON’S OBJECTION TO PPO

1. According to the Clerk, this case was brought to this court and Denied on or about November 17, 2023
2. This Issue arises from a civil case on the docket of Judge Caretti. # 2023-001-402-CB For Breach and Contact, Tortious Inference with Contactual Relations and/ or Business Expectancy
3. On or about 11/19/2019 whereas Mr . Doelle Entered info a Non-Compete agreement with My Business, Detroit Bathtubs
4. On or about 06/22/2022, Mr. Doelle breached his agreement by starting his own business while working with me for about 8 months.

EX. B2

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5. We parted Company on or about 02/24/2023 whereas Mr. Doelle, Took Home 74 show leads from Me, and used them as his own.
6. This has caused damages of \$396,000 for the year of 2022. And does not include damages for 2023.
7. Judge Caretti Ruled on Mr. Doelle's Motion for Summary Disposition
8. I am representing Myself to hold Mr. Doelle accountable for the contract he signed.
9. I have sued him in the correct venues, A. Macomb County as we are both Macomb County Residents B. Federal Case that involves a Federal Question and that the defendant's are located in Ontario Canada, and Jacksonville Florida. C. 41-B district court for small claims issues
10. Defendant, IPower.com was settled for zero dollars
11. Defendant, National Acrylics was made the same offer, with no reply
12. The Federal Case was caused by Mr. Doelle Attorneys trying to impress his clients by sending False / Fake information to ipower.com Causing 15 of My websites to be taken down.
13. Most of the supporting documentation in his motion is based on items I have supplied in my Pleadings
14. The rest is mostly Facebook Posts that were made telling the truth and Mr. Doelle and Myself are not Facebook Friends since about 02/24/2023.
15. The other information is a news reports from about 10 years before I met Mr Doelle and was public information. If Mr Doelle was so concerned about my past he should have not signed his agreement to work with me and not take leads from me and cost me \$396,000 in revenue .

IN CONCLUSION, I RESPECTFULLY ASK THIS COURT TO DENY THE PERSONAL PROTECTION ORDER. I have done nothing but sue him in the proper venues, post on Facebook and make web sites that were a functions of free speech



Thursday, December 14, 2023
Robert Anderson