

**IN THE 15TH JUDICIAL, DISTRICT COURT
LAFAYETTE PARISH, LOUISIANA**

AIMEE BOYD ROBINSON	§	
	§	DOCKET NO. 20234480
vs.	§	
	§	
PRISCILLA GONALEZ	§	

**DEFENDANTS MOTION TO DISMISS PLAINTIFF'S
ORIGINAL COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COME Priscilla Gonzalez, filing this, *Motion to Dismiss Plaintiff's Original Complaint*, and showing in support of same as follows:

INTRODUCTION

Plaintiff Aimee Boyd Robinson's endeavor to substantiate her claim has proven markedly deficient in providing the requisite evidential foundation. In light of the glaring inadequacies apparent in her presentation, I am compelled to assert my contention for the swift and judicious dismissal of the aforementioned case. This assertion is grounded in the fundamental premise that the lawsuit at hand bears the telltale marks of frivolity, devoid of both legal merit and substantive basis.

Upon a *rigorous* examination of the evidence tendered by the plaintiff, a conspicuous void emerges where the bedrock of substantiation should reside. The threads of her argument, though woven with apparent determination, unravel upon closer scrutiny, unable to achieve the requisite threshold to establish a cogent cause of action. The mosaic of facts presented, rather

than coalescing into a compelling narrative, appears fragmented and disjointed, incapable of constructing a persuasive rationale for pursuing this legal recourse.

At the heart of my contention lies the assertion that the evidence proffered is not only scant but also fails to surmount the fundamental benchmark required for any legal claim. The scaffolding of legal discourse demands a sturdy edifice of factual support upon which the framework of a lawsuit can stand. Regrettably, the evidentiary elements put forth by the plaintiff crumble under the weight of this requirement, leaving her claim precariously unsupported and bereft of the requisite foundation.

It is with a sense of duty to uphold the integrity of the legal system that I advocate for the dismissal of this case. The court's resources and the parties involved deserve to be spared the protraction of a legal battle bereft of legitimate legal standing. In the absence of a solid and substantiated cause of action, the pursuit of this lawsuit becomes an exercise in futility, detracting from the genuine and meaningful matters that deserve the court's attention.

The insufficiency of evidence, the lack of legal merit, and the absence of substantive support render Plaintiff Aimee Boyd Robinson's lawsuit frivolous and without foundation. It is on these grounds that I firmly request the prompt and equitable dismissal of the case in question, safeguarding the principles of justice and preserving the efficacy of the legal process.

LACK OF EVIDENCE

The plaintiff's endeavor to challenge the credibility of Ms. Gonzalez, Defendant has been marked by a succession of assertions and speculative assumptions. In her fervent pursuit of disqualifying her, she has embarked upon a narrative woven with conjectures that, upon closer examination, fail to stand up to the rigorous standards of substantiation.

Despite her negligent efforts, the evidence proffered by the plaintiff remains

conspicuously lacking in its ability to attain the necessary threshold of proof mandated by the legal framework. The foundation upon which she has built her case appears to be constructed upon unstable ground, riddled with gaps and inconsistencies that cast doubt upon the veracity of her claims.

In the realm of legal proceedings, the burden of proof assumes a paramount role, demanding a level of substantiation that transcends mere supposition. Regrettably, the lack of evidence at hand falls woefully short of meeting this exacting standard. As a consequence, the plaintiff's attempts to discredit Ms. Gonzalez appear tenuous and unconvincing, unable to surmount the formidable barrier that separates mere allegations from the irrefutable establishment of fact.

In summation, the plaintiff's case, while vigorous in its assertions, falters in its ability to furnish the requisite evidentiary support essential for the task of disqualification. The chasm between her contentions and the evidentiary demands of the legal arena remains a stark reminder of the importance of substantiated claims within the boundaries of due process.

BURDEN OF PROOF

Central to the tenets of our legal system is the foundational principle that the plaintiff bears the onus of substantiating their claims through the presentation of evidence, and it is incumbent upon them to do so by a preponderance of the evidence. A careful and critical examination of the evidence proffered by the plaintiff, however, reveals a glaring disparity between the asserted burden and the actual evidentiary foundation put forth. The scales of justice remain markedly unbalanced, as the evidential corpus falls significantly below the threshold required to satisfy this demanding burden.

In her quest to establish a persuasive case against the defendant, the plaintiff has ventured into a terrain beset with inadequacies and gaps. The evidentiary tapestry she has woven, though intricately threaded, is marred by conspicuous lacunae that undermine the strength of her argument. The thread of causality linking her assertions to the alleged transgressions of the defendant appears tenuous at best, leaving a discernible void in the chain of logic necessary to substantiate her claims.

While legal proceedings allow for a reasonable degree of inference, the evidence must nonetheless coalesce into a coherent narrative that substantiates the plaintiff's contentions. Alas, the evidentiary mosaic presented falls short of achieving this vital cohesion. Assertions and suppositions, while perhaps compelling in isolation, fail to accumulate into the weighty body of proof required to tip the scales in the plaintiff's favor.

Moreover, the absence of a compelling case becomes increasingly evident as one scrutinizes the evidentiary foundation for its depth and solidity. The requisite preponderance of evidence necessitates not merely a collection of assertions, but a robust assembly of facts and corroboration that collectively create an overwhelming probability in favor of the plaintiff's claims. Regrettably, the evidence before us lacks the requisite gravitas to establish such a compelling narrative.

In light of these considerations, it becomes clear that the plaintiff's attempt to meet the burden of proof has fallen significantly short. The yawning chasm between the required preponderance of evidence and the actual evidentiary presentation serves as a stark reminder of the weighty responsibility borne by the plaintiff in establishing their case. The scales of justice, while poised for equilibrium, remain tipped in favor of insufficiency. As such, it is incumbent upon this legal forum to recognize the deficit in evidentiary support and to deliberate

upon the implications this deficit bears upon the plaintiff's capacity to substantiate her claims.

EVIDENCE TO SUPPORT DEFENDANTS QUALIFICATIONS FOR
MAYOR-PRESIDENT

Exhibit A: Lease Agreement

As Exhibit A demonstrates, I entered into a one-year lease agreement for a residence located at 504 Fox Run in Lafayette, Louisiana. The lease agreement, dated February 3, 2021, clearly stipulates my occupancy for a period exceeding twelve months, thereby substantiating my status as a resident of Lafayette, Louisiana, for over a year.

REQUEST FOR DISMISSAL

In view of the conspicuously spurious and deceitful evidence proffered by the plaintiff, I earnestly and respectfully petition this Honorable Court to exercise its authority and render a definitive decree for the dismissal of the plaintiff's complaint, resolutely precluding any future attempts at reassertion. The imposition of dismissal with prejudice stands as the unequivocal and judicious response to the plaintiff's deliberate and calculated act of introducing fraudulent evidence, an egregious offense that strikes at the very heart of this Court's procedural tenets and moral obligations.

Dismissal with prejudice, under the circumstances manifest herein, constitutes not a mere consequence, but an imperative and formidable sanction. The plaintiff's wanton submission of false evidence represents a brazen and inexcusable violation of the Court's sacrosanct rules and ethical canons, undermining the integrity of the judicial process and

impeding the pursuit of truth. Such a malevolent transgression mandates a potent response, one that unequivocally communicates to all parties the Court's unwavering commitment to upholding the sanctity of justice.

In light of the plaintiff's injurious actions, dismissal with prejudice emerges as the judicious and proportionate retribution that reflects the gravity of the offense. The Court's authority is pivotal in both safeguarding the sanctity of legal proceedings and maintaining the trust that litigants, legal professionals, and the public place in the impartiality of the judicial institution. A dismissal with prejudice stands as a salient marker, unequivocally denoting the plaintiff's transgression and serving as a potent deterrent against future acts of misconduct.

In summation, I implore this Honorable Court to exercise its discretion with sagacity and wisdom, and, in recognition of the seriousness of the plaintiff's actions, to decree the dismissal of the plaintiff's complaint with prejudice. In so doing, the Court reaffirms its unwavering commitment to the principles of justice, integrity, and ethical rectitude, fortifying the edifice of jurisprudence upon which the foundation of our legal system is secured.

ALTERNATE RELIEF

In light of the manifestly mendacious and deceitfully contrived evidence marshaled by the plaintiff, I respectfully and with utmost gravity petition this esteemed Court to exercise its august prerogative and render a definitive edict mandating the summarily dismissive termination of the plaintiff's complaint. The imposition of a dismissal with prejudice, under these palpably egregious circumstances, stands as an imperative and exacting sanction, commensurate with the plaintiff's malevolent and deliberate act of submitting falsified evidence—a transgression that flagrantly affronts the Court's revered rules and ethical norms.

Dismissal with prejudice, herein proposed, transcends mere consequence to assume the

status of an unassailable mandate. The plaintiff's orchestrated submission of disingenuous evidence punctuates an unconscionable disregard for the sanctity of the judicial apparatus, corroding its very foundations and obfuscating the pursuit of truth. The profound gravity of this violation compels a potent and unequivocal response, one that unequivocally communicates to all stakeholders the Court's resolute and unwavering commitment to upholding the quintessence of justice.

In the event that the Court, in the exercise of its wisdom, deems dismissal with prejudice to be unwarranted, I alternatively beseech this august forum to effectuate a judicious recalibration of proceedings. I implore the Court to forthwith excise the mendacious evidence from the ambit of consideration, expunging it from the record with due expediency. Furthermore, I ardently urge the Court to proactively address the plaintiff's egregious misconduct with requisite gravitas, deploying all measures at its disposal to rectify this disconcerting breach.

Compounded to the plaintiff's culpability is the incursion upon the taxpayers' coffers occasioned by this frivolous litigation, necessitating a restorative reckoning. We strenuously advocate that the plaintiff be held financially accountable, with due cognizance of their responsibility to *reimburse the tax-paying public* for the undue burden imposed by this unwarranted exercise of the court's resources.

I humbly implore this Honorable Court to wield its judicial acumen with sagacity and acuity, and in full recognition of the plaintiff's transgressions, to pronounce a definitive dismissal with prejudice or, alternatively, to orchestrate the expurgation of the false evidence, its subsequent exclusion from consideration, and the invocation of salutary measures to address the plaintiff's transgression. In so doing, the Court not only upholds its exalted role as the sentinel of justice but also safeguards the sanctity of the legal crucible, resolutely defending the integrity of

the legal system from malevolent incursions. I remain committed to upholding the principles of justice and fairness and trust that this Court will carefully consider the merits of our motion.

Respectfully Submitted,

Priscilla Gonzalez, Pro Se
Mailing Address: 301 Gerald, Drive
Lafayette, Louisiana 70503
Phone number: (956) 563-6558
Email: prisformayor@gmail.com

PARISH OF LAFAYETTE

RESIDENTIAL LEASE AGREEMENT

Date 2-2-2021

PARTIES: Gordon Investment LLC./Scott Gordon (to be referred to as Landlord or Agent for Landlord) hereby leases to:

PRISCILLA GONZALEZ

To be referred to as Tenant, the following described property:

PREMISES 504 Fox Run #A/C

For use by resident as a private residence only, as agreed by the parties.

TERM This lease is for a term commencing on the 3rd day of FEBRUARY and ending on the last calendar day of JANUARY 2022.

AUTOMATIC RENEWAL If Tenant or Landlord desires that this lease terminate at the expiration of its term, he must give to the other written notice at least 30 days prior to that day. Failure of either party to file this required notice will automatically renew this lease on a month to month basis. If the written notice to terminate the month to month lease agreement is not received a full 30 days prior to the first day of the following month, the tenant will be required to pay the full rental payment for the following month.

RENT This lease is made for and in consideration of a monthly rental of \$ 800.00 which is due on the first day of each month. Rental payments made to the order of:

Scott Gordon
c/o Gordon Investments LLC
121 Girard woods Dr.
Lafayette, LA 70503

If Tenant pays by check and said check is not honored on presentation for any reason whatsoever, Tenant agrees to pay an additional sum of \$35.00, and Tenant will be required to make future payments in cash or money order. The rent shall be due on the first (1st) day of each month and if not paid in full by the fifth (5th) day of the month prior to 5:00 PM, a late charge of \$25.00 on the sixth (6th) day of the month will be charged. In addition, a \$10.00 per day charge thereafter until rent is paid in full shall also be added as part of the rent. The penalty provisions stated herein are not to be considered as a waiver or relinquishment any of the rights or remedies of the Landlord.

EXHIBIT A