

THE SUPREME COURT
State of Washington

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7 LONNIE RAY TRAYLOR)
8 Petitioner) CASE NO. 94105-0
9 V) MOTION TO COMPEL
10) DISCOVERY
11 MOST WORSHIPFUL PRINCE)
12 HALL GRAND LODGE F.A.M.)
13 WASHINGTON & JURSDICTION)
14 AND MOST WORSHIPFUL GRAND)
15 MASTER GREGORY D. WRAGGS, SR)
16 Respondents)
17 _____)

PETITIONER MOTION TO COMPEL DISCOVERY

17 The Petitioner Lonnie Ray Traylor moves pursuant to Washington
18 Court Rule CR 26 and CR 34 for an Order compelling the Respondents,
19 Most Worshipful Prince Hall Grand Lodge to promptly produce all
20 Official Charges from the Church, Organization and a unknown Private
21 Citizen filed against Petitioner.
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23 Also the Audio Recordings of the 111th Annual Grand Session
24 and the Petitioner Masonic Trial Tape of May 20, 2014.
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4 STATEMENT OF FACTS

5 Petitioner filed his civil complaint on November 12, 2014,
6 specifically on the grounds of discrimination, unfair treatment,
7 deformation of character and within the Grand Lodge being accused of
8 Theft.
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10 Respondents have never provided the original charges of the
11 allegation to which the Petitioner has been charged.

12 1. Petitioner have requested discovery in the form of Interrogatories
13 and Request for Production of Documents and Respondents or their
14 Respondent Counsel James Fowler never provided since the filing of the
15 original complaint dated November 12, 2014 and February 27, 2015.

16 (CP 1) (RP 4 - 10)
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18 2. On April 3, 2015 the superior court advise Petitioner to visit
19 Respondent Counsel James Fowler office to review whatever discovery
20 he had and report back to the court the findings.
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22 Judge Chuschoff stated “ if the Respondent did not produce
23 discovery that the court would order them to do so. (RP 6 - 9)
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4 3. On April 14, 2015, Petitioner mailed a letter to Respondent
5 Counsel James Fowler office attempting to schedule appointment to
6 review the discovery evidence.

7 Petitioner visited to Respondents Counsel James Fowler office
8 on April 26, 2015, to see what discovery he had to offer.

9 During Petitioner visit it was discovered that the Audio
10 Recordings of Petitioner Trial was not available nor was the
11 111th Annual Grand Session Audio Recordings. (CP 302)

12
13 5. On June 5, 2015, Petitioner reported back to the court that
14 during Petitioner visit and reviewed of discovery, there were
15 No Audio Recording of the Masonic Trial Tape of him and neither
16 was there any Audio Recordings of the 111th Annual Communication
17 that the Respondent Counsel stated he had in his office. (RP 4 - 18)

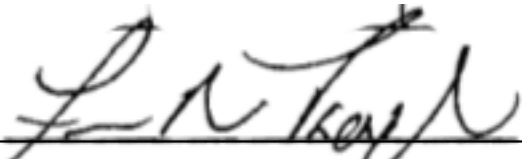
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19 To date, Petitioner have yet to receive any of the requested
20 production of documents. The court rule in favor of Respondent
21 without requiring Respondent Counsel Fowler to produce discovery
22 that would prove Petitioner was not guilty of the allege allegations.
23 (CP 16-31)

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The Court failed to sanction Respondent Counsel for not complying with Petitioner request for discovery for production CR 26 and CR 34. (CP 413 - 418) (CP 529 - 531)

WHEREFORE, the Petitioner moves for an Order Compelling the original charges from the church, private citizen and organization, and Respondent produce and executed answer also of the Audio Recording of the 111th Annual Communication and Audio Recording Masonic Trial of May 20, 2014.

RESPECTFULLY SUBMITTED this 10th day of MARCH 2017

By:  _____

Lonnie R. Traylor
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traylor48@q.com

THE SUPREME COURT
State of Washington

LONNIE RAY TRAYLOR

Petitioner

v

Supreme Court No. 94105-0

Court of Appeal Case No. 48322-0-II

**DECLARATION OF
DOCUMENT FILING AND SERVICE**

**MOST WORSHIPFUL PRINCE HALL GRAND
LODGE F.A.M. WASHINGTON & JURISDICTION
and MOST WORSHIPFUL GRAND MASTER
GREGORY D. WRAGGS, SR.**

Respondents

DECLARATION OF DOCUMENT FILING AND SERVICE

I, LONNIE RAY TRAYLOR, DECLARE THAT ON THE **10TH DAY OF MARCH 2017**, WE, CAUSED THE ORIGINAL **MOTION TO COMPEL DISCOVERY** TO BE FILED IN THE SUPREME COURT AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

<input checked="" type="checkbox"/>	JAMES C. FOWLER, WSBA # 15560	<input type="checkbox"/>	U.S. MAIL
	1201 PACIFIC AVE STE 1900	<input checked="" type="checkbox"/>	HAND DELIVERED
	TACOMA, WA 98402	<input type="checkbox"/>	AGREED E-SERVICE VIA COA PORTAL

SIGNED IN LACEY, WASHINGTON THIS 10TH DAY OF MARCH 2017