

FILED
SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT NO. 1044445
Court of Appeals No. 603519

**IN THE SUPREME COURT
OF THE STATE OF WASHINGTON**

ISAAC M. NSEJJERE,

Petitioner,

v.

CARYN ANDERTON,

Respondent.

ON APPEAL FROM THE COURT OF APPEALS OF THE
STATE OF WASHINGTON, DIVISION II

**RESPONDENT'S REPLY IN SUPPORT OF MOTION TO
SEAL PETITION FOR WRIT OF CERTIORARI**

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I. RELIEF REQUESTED.

COMES NOW Respondent Caryn M. Anderton, by and through her attorneys of record, Colleen A. Lovejoy and James G. Fick, and respectfully requests that the Court hold a hearing to seal Petitioner Issac M. Nsejjere's Petition for Writ of Certiorari, enter written findings that the sealing is justified by compelling privacy and safety concerns, and thereafter order the sealing of the Petition for Writ of Certiorari, as well as this Motion to Seal Petitioner's Writ of Certiorari.

II. REPLY.

A. Petitioner Continues to use the Court to Harm Anderton and Others.

Petitioner's Response to Respondent's Motion to Seal highlights the substantial need for this Court to seal all filings associated with Petitioner's Writ of Certiorari ("Writ").

Petitioner's response fails to address the serious concerns regarding Petitioner's disclosure of personal and private information about innocent third parties who have nothing to do

with this case. Instead, in his response, he included an unredacted copy of Salimas' (yet another innocent third-party) Permanent Resident Identification Card and passport, as though he had not embarrassed Salimas enough already by discussing his sexual relations with her (and whether it should be considered pedophilia) in the public record. Petitioner's Response only considers how *he* might be perceived, all while ignoring that *he* was the one to put the allegations against himself into the public record in the first place, dragging Salimas down with him.

There is no way to determine the authenticity of the documents purportedly belonging to Salimas, but nonetheless, they certainly need to be sealed. They include Salima's date of birth, USCIS number and disclose her immigration status, all of which could be incredibly harmful to Salimas.

These improper filings by Petitioner are not even relevant to these proceedings. The Court of Appeals affirmed that Petitioner's defamation claim against Respondent related to his sexual relationship with Salimas was not defamation because

Petitioner failed to deny that he had sex with her when she was underaged and because the audience of said defamatory remarks – Salimas herself – was perfectly capable to determine the truth for herself. Even if Petitioner could prove he did not have sex with her while underage, the alleged comments by Respondent to Salimas are still not defamatory. Including Salimas' private and sensitive information was unnecessary and tremendously harmful to Salimas who has no one to defend her in this action.

To be sure, Petitioner's filings also harm Respondent and should be sealed for that reason as well. Indicative of his intentions, Petitioner's response argues that Respondent Anderton's embarrassment alone is not grounds to seal. But here, the entire purpose of Petitioner's lawsuit was to embarrass Respondent and Petitioner has been sanctioned and labeled as a vexatious litigant for doing so.

The lower courts already concluded that Petitioner's lawsuit and claims are baseless and brought with the intent to harm and shame Respondent. In his Writ, Petitioner increased his

vexatiousness, by publishing false, defamatory and harmful statements about non-parties, including sensitive and private identifying information, and Petitioner attempts to ignite public hatred and shame toward Respondent, or anyone else named Karen.

It is plainly obvious the filings need to be sealed because their only purpose is to embarrass Respondent and Petitioner's filings create a safety and privacy concern for both Respondent, her family and friends, and now for Salimas.

B. Petitioner's claims of Racism are Irrelevant to Defamation and the Legal Issues in this Case.

Petitioner objects to Respondent's motion, arguing there is a public interest in Respondent allegedly behaving like "a Karen" and somehow the death of George Floyd justifies Petitioner's actions in this matter. Petitioner provides no legal authority to suggest that a defamation case between he and an ex-girlfriend is a matter of public interest, especially considering the alleged defamation was in private text messages. Moreover,

George Floyd has no relevance to his claims of defamation.¹
Petitioner's filings are nonsensical and provide no basis for review, nor are they of public interest.

III. CONCLUSION.

Petitioner's vexatious litigation tactics have only become more vexatious since the Court of Appeals affirmed the trial court decision. Petitioner has been sanctioned and warned that his filings are improper, but Petitioner had plainly ignored those orders and escalated his vexatiousness. The court should seal these filings.

This document contains 730 words, excluding the parts of the document exempted from the word count by RAP 18.17.

Respectfully submitted: October 3, 2025.

SCHLEMLEIN FICK & FRANKLIN, PLLC

By: /s/ Colleen A. Lovejoy

James G. Fick, WSBA No. 27873

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¹ Petitioner likely repeated the name "George Floyd" in hopes his harmful filings would reach a greater audience, increasing the harm to Respondent, her family and Salimas.

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am an employee at Schlemlein Fick & Franklin, PLLC, over the age of 18 years, not a party to nor interested in the above-entitled action, and competent to be a witness here. On the date stated below, I caused to be served a true and correct copy of the above document on the below-listed attorney(s) of record by the method(s) noted:

☒ Via Appellate Portal and Email to the following:

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DATED: October 3, 2025.

s/ Lacey Georgeson

Lacey Georgeson, Legal Assistant

SCHLEMLEIN FICK & FRANKLIN, PLLC

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Transmittal Information

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Superior Court Case Number: 24-2-01311-1

The following documents have been uploaded:

- 1044445_Answer_Reply_20251003161734SC705596_0482.pdf
This File Contains:
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