

1988

H. Wayne Wadsworth v. Stanley C. Mann and Quest Publications, Inc. and Western Marketing Resources, Inc. : Reply to Response to Writ of Certiorari

Utah Supreme Court

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Ray R. Christensen; attorney for respondent.

Stanley C. Mann; pro se.

Recommended Citation

Reply to Response to Petition for Certiorari, *Wadsworth v. Mann*, No. 880225.00 (Utah Supreme Court, 1988).
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880225

IN THE UTAH SUPREME COURT
OF THE
STATE OF UTAH

H. WAYNE WADSWORTH,)	
)	
Plaintiff/Respondent,)	
)	Case No. 880225
vs.)	
)	PRIORITY NO. 13
STANLEY C. MANN)	
)	
Defendant/Petitioner,)	
)	
QUEST PUBLICATIONS, INC.,)	
and WESTERN MARKETING)	
RESOURCES, INC.,)	
)	
Defendants.)	

PETITIONER MANN'S REBUTTAL TO RESPONDENT WADSWORTH'S RESPONSE
IN OPPOSITION TO DEFENDANT'S PETITION FOR WRIT OF CERTIORARI

STANLEY C. MANN, Pro se.,
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FILED
JUL '21 1988

Clerk, Supreme Court, Utah

Appellant Stanley C. Mann submits the following response:

ARGUMENT

1. Appellant Stanley C. Mann's Writ of Certiorari was timely filed consistent with Rule 10(d), Utah Rules of Appellate Procedure.

The Appellate Court has as of this date has not responded to Appellant's "Motion for Review and Clarification", as admitted by Respondent on Page 2, paragraph 2, of Respondent Wadsworth's Response in Opposition to Defendant's Petition for Writ of Certiorari.

2. This Petition of Writ of Certiorari should be granted for the following reasons:

a. To uphold the Constitutions of the United States and the State of Utah.

b. The Due Process of Law guaranteed by those two documents.

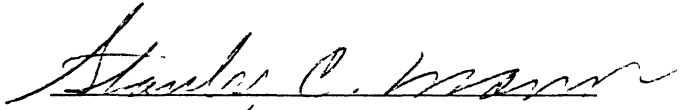
c. To correct the indisputable error of fact by the Appellate Court regarding appellant's failure to file Motions to Compel under Rule 37, URCP.

3. The interest of moral character in upholding the constitutional rights of individuals supercedes the interest of judicial economy to allow the acts of a disreputable lawyer to go unpunished.

CONCLUSION

No appellate body with moral character or intellectual integrity could ever produce an Opinion, which denied the existence of five (5) documents in the file, cited by appellant, directly refuting their Opinion.

Submitted this 20th day of July, 1988.


Stanley C. Mann, Pro, se.,

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the Defendant/Petitioner's PETITIONER MANN'S REBUTTAL TO RESPONDENT WADSWORTH'S RESPONSE IN OPPOSITION TO DEFENDANT'S PETITION FOR WRIT OF CERTIORARIMOTION FOR REVIEW AND CLARIFICATION, this 20th day of July, 1988, to:

Ray R. Christensen Esq.,
Gainer M. Waldbillig
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