

EXHIBIT D

THIS IS HEARST'S BIG AND ONLY WITNESS
WHO WAS HEARD BY POLICE AND DOES NOT
HAVE AN INDIVIDUAL POLICE REPORT
THE LONE NAME IN **ARTICLE #2**
AND LONE QUOTES AKA DESCRIPTIONS
WENDY HIGGINS CHAMBERS
ACTUAL QUOTES IN ARTICLE
WHERE SHE NEVER USES THE TERM **HARASS**
NOR DOES SHE USE THE TERM **HARASS** IN
HER AFFIDAVIT FROM MY SLANDER
LAWSUIT AGAINST HER.

AND A TRUE STORY AND **SUSPICIOUS**
RESULT FROM MY LAWSUIT AGAINST HER -
SHE REFRAINS FROM FOLLOWING THROUGH
ON ASKING FOR \$16,970 IN ATTORNEY FEES.
THIS "VICTIM" ASKED FOR NOTHING.

AFFIDAVIT OF WENDY HIGGINS CHAMBERS FROM MY CASE AGAINST HER THAT DOES NOT USE THE TERM **STALK OR HARASS.**

HERE YOU CAN SEE HOW NO MORE THAN 5 LINES ARE ATTEMPTING TO SUM UP WHAT HAPPENED OVER AT LEAST 10 MINUTES. WHERE ARE THERE EXAMPLES OF ANYTHING THAT WAS SAID? IS THIS AN "UNWANTED ADVANCE" AS SOME MEDIA WRITE OR **HARASSMENT**? **WHAT KIND OF HARASSMENT**? THE AFFIDAVIT AVOIDS SO MANY DETAILS AND FLAT OUT LIES SO HOW COULD ANYONE CONCLUDE THERE WAS **HARASSMENT**. AT THE TIME OF OUR ONE CROSSING OF PATHS, THIS WOMAN MADE NO ATTEMPT TO CONTACT ANYONE – POLICE, STORE MANAGER, OR EVEN ME HAVING MY BUSINESS CARD TO VOICE A COMPLAINT. THE POLICE DO NOT HAVE ANY INCIDENT REPORT OF HER PATHETIC STORY FROM HER MARCH 15, 2018 VISIT AND NEVER CONTACTED ME ABOUT HER AFTER SHE DEPLOYED NEWS 12 AGAINST ME ON MARCH 14, 2018 AND BEFORE SHE PERSISTED BY GOING TO THE WESTPORT NEWS ON MARCH 23, 2018.

THIS OLD WOMAN HAD AN AGENDA AND YOU WOULD THINK THERE WOULD BE SOME KIND OF DAMAGES OR CREDIBLE **HARASSMENT STORY** FOR HER PERSISTENCE AND UNJUST ABILITY IN THIS CRAZY CULTURE TO DEPLOY MEDIA AGAINST SOMEONE ALL THE WHILE NOT HAVING A CREDIBLE STORY TO THE POLICE. **MEDIA ARE AFTERALL FAR MORE DAMAGING THAN POLICE INCIDENT REPORTS DEVOID OF ARREST LET ALONE NO POLICE INCIDENT REPORT – BOTH SCENARIOS HAVING INVESTIGATIONS UNLIKE MANY MEDIA METOO STORIES.** MEDIA CHOOSING THEIR OWN WORDS THAT ARE ACTUAL CRIMES/STATUTES – **HARASS OR STALK** – DEMANDS NAMES AND **QUOTES AND DESCRIPTIONS IN TUNE WITH THE DEFINITIONS OF THESE COURSE OF CONDUCT WORDS.** **DOES WENDY HIGGINS CHAMBERS WHO IS HEARST'S LONE WITNESS DO THIS HERE?**

I AM A MAN WHO GAVE HER A BUSINESS CARD WITH MY SOCIO-POLITICAL WEBSITES AND NEVER SAW OR CARED TO SEE HER AGAIN. AS YOU CAN READ, A CHILD HAS BETTER STORY TELLING ABILITIES THAN WENDY HIGGINS CHAMBERS. FOR EXAMPLE, WHAT WAS SAID INSIDE THE STORE WHEN SHE CLAIMS TACTFULLY THAT SHE "*DISENGAGED TWICE*" SO TO APPEAR SHE HAD A CREDIBLE STORY ALL THE WHILE REMAINING UNDER A COVER NOT TO USE COURSE OF CONDUCT WORDS. YES, NOTICE THE EMPHASIS ON "TWICE" WHILE ALSO AVOIDING THE EXTREME WORD **STALK OR HARASS**. ALSO, WHAT HAPPENED WHEN I "*JUMPED OUT OF MY CAR*"?

THE FACT WAS SHE CHECKED OUT WITH ME AFTER A 10 MINUTE CONVERSATION. IT IS FROM THIS CONVERSATION OF HOW SHE TOLD ME WHERE SHE WORKED AMONGST OTHER THINGS. I DROVE BY HER AND HANDED HER MY BUSINESS CARD IN A PEACEFUL WAY SHARING MY IDENTITY (MY BUSINESS CARDS WERE IN MY CAR). I NEVER SAW HER AGAIN. SHE NEVER TOOK THIS BUSINESS CARD TO POLICE AND ONLY BECAME "*CONCERNED FOR OTHER WOMEN*" AFTER SHE READ OF MY FALSE ARREST. THIS SUBURBAN HOUSEWIFE WANNABE VIRTUE SIGNALING SOCIAL JUSTICE WARRIOR IS HEARST'S BIG AND ONLY WITNESS/NAME/QUOTE TO DATE.

DOCKET NO. FST CV20-5022942S : SUPERIOR COURT
 JAMES LAWRENCE : JUDICIAL DISTRICT OF
 VS. : STAMFORD/NORWALK AT STAMFORD
 WENDY HIGGINS CHAMBERS : April 6, 2020

AFFIDAVIT

The undersigned, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen and believe in the obligation of an oath.
2. I have personal knowledge of the facts set forth herein.
3. I make this affidavit in support of the special motion to dismiss.
4. I am a resident of Westport, Connecticut.
5. I was approached by James Lawrence inside and outside of a supermarket in Westport in approximately January 2018 around 7:30 PM. After I disengaged in conversation with him twice inside the store, he pulled up in front of my car in a dark parking lot, jumped out and came quickly towards me. I saw him again at a supermarket in Westport a week or so later.
6. The encounters with Mr. Lawrence frightened me and made me very uncomfortable.
7. After seeing a story in the news in or about March 2018, a story about Plaintiff's arrest for similar conduct at the Fresh Market in Westport, I called the Westport Police to report that I had similar encounters with the Plaintiff.
8. After seeing that news story, I also communicated with the local news media about the similar encounters I had with Mr. Lawrence, in an effort to let other women know about the risk and to help keep women in my community safe. I requested my name be kept anonymous.
9. These statements are true and accurate to the best of my knowledge, information and belief.

THE AFFIANT

Wendy Higgins Chambers
 Wendy Higgins Chambers

Subscribed and sworn to before me this 6 day of April, 2020

J. J. [Signature]
 Commissioner of the Superior Court
 Notary Public
 My Commission Expires:

THIS IS HEARST'S ONLY WITNESS TO DATE - Wendy Higgins Chambers

– an older woman in her late 50s. I present this for there are no pictures of her from Hearst and she has never made an appearance yet despite being asked to appear in the late stages of Lawrence v. Chambers. I provide as many pictures as possible to avoid bias.



CONCEALED. A WOMAN NEVER SEEN, NOT EVEN BEFORE ANY JUDGE IN MY LAWSUIT AGAINST HER.



THIS IS NOT A WOMAN THAT THE AVERAGE VIEWER WOULD THINK I WOULD HAVE ANY SEXUAL INTEREST IN LET ALONE TO ANY POINT OF **HARASSMENT** WHEN TALKING ABOUT THE INNOCUOUS AND YES VERY NEBULOUS DETAILS OF THE ESTABLISHED ONE TIME ENCOUNTER IN A SHARED PUBLIC SPACE - SUPERMARKET. THERE IS OBVIOUSLY MORE GOING ON HERE!!!

ONCE AGAIN, WENDY HIGGINS CHAMBERS READ THE WESTPORT NEWS ARTICLE #1, MADE A BEELINE TO NEWS 12/ALTICE ON MARCH 14, 2018 REFERENCING A PREVIOUS ENCOUNTER WITH ME MONTHS AGO THAT RESULTED IN NO COMPLAINTS TO ANYONE - POLICE, STORE MANAGER, OR EVEN MYSELF. NEWS 12/ALTICE TOOK DOWN THEIR COVERAGE AFTER ONE DAY ON MARCH 15, 2018. SHE THEN WENT TO THE WESTPORT NEWS 9 DAYS LATER ON MARCH 23, 2018 FOR THE ARTICLE #2 AGENDA DRIVEN HITJOB WITH HEARST REPORTER SOPHIE CECILIA VAUGHAN. THIS WOMAN HAS NO INDIVIDUAL INCIDENT REPORT WITH THE POLICE. A CLEAR AND OBVIOUS CASE OF VIRTUE SIGNALING AND SELF-APPOINTED SOCIAL JUSTICE WARRIOR.



What we have here is a virtue signaling and yes very real case of a mentally imbalanced older woman desire to be some kind of Social Justice Warrior (SJW) but with a hidden agenda. SHE LOOKS LIKE A GRANDMOTHER AND THIS IS BEFORE WE MET!!!!



WHO THE HELL IS THIS CURLY HEADED MENDACIOUS OLDER WOMAN!!! I MET THIS PERSON IN 2017 BRIEFLY AT STOP AND SHOP SUPERMARKET. I gave her my business card as article states with a list of my websites – that “*obscure website*” mentioned in article to check out after a 10-15 minute conversation in the market. She never made a complaint to anyone – NOT TO STORE MANAGER, NOT TO THE POLICE, AND NOT TO ME FOR SHE HAD MY CONTACT INFORMATION. And then reading about me arrested for one count of Second Degree Breach of Peace begins an assault on my life. WHY? NO OTHER WOMAN DID THIS – THIS IS HEARST’S BIG WITNESS TO DATE.

THERE IS OBVIOUSLY MORE GOING ON HERE!!! HER AVOIDING BEING INTERROGATED (See EXHIBIT D CONTINUED) IS VERY TELLING. JUSTICE WOULD ALLOW THE EXECUTION OF THE CASE MANAGEMENT PLAN TO GET MORE DETAILS SO THIS SOLE WITNESS/NAME TO DATE FROM HEARST IS PROPERLY QUESTIONED BY ME FOR SHE IS OBVIOUSLY HIDING SOMETHING AS IS HEARST’S 22 YEAR OLD REPORTER SOPHIE C. VAUGHAN. I THINK REPORTER WOULD HAVE SOME VERY TELLING INFORMATION UNDER OATH.

EXHIBIT D Cont.

WHO IS THE REAL VICTIM??

A TRUE STORY OF THIS WOMAN ASKING FOR \$16,967.00 IN ATTORNEY FEES DURING MY SLANDER LAWSUIT AGAINST HER ONLY FOR HER TO WITHDRAW THE REQUEST AFTER THE LEGAL PROCESS LEARNING OF ALL THE DETAILS FROM ALL RESPONSES AND EXHIBITS AND PRESENTED IN MY VARIOUS LAWSUITS SHE FOMENTED LIKE THE 2 FEDERAL LAWSUITS AGAINST THE MEDIA AND INEVITABLY MORE LAWSUITS IN THE FUTURE.

SUSPICIOUS HAPPENING FROM JAMES LAWRENCE V. WENDY HIGGINS CHAMBERS: A true story with substantial questions in need of being answered.

The following is significant if not fascinating so bear with the story telling. I write 2 pages in single spaces because a trial has yet to be afforded to me to show all the details of this persecution in tune with the special zeitgeist that demands everyday people weigh in on the new victim playing trends. This entire fiasco is more than a novel. It is a 2-page true story.

I chose to sue relative parties in the order of the attack AGAINST ME with Altice/News 12 being the first sued. My next lawsuit was against Wendy Higgins Chambers for slander, for she is not only the sole instigator for the special news outside of the actual arrest but is the only woman coming forward aka Hearst's only witness to date. In James Lawrence v. Wendy Higgins Chambers, a Connecticut Judge Edward Krumeich dismissed the case in Sept. 2020 based on a new 2018 Ct. Anti-SLAPP law giving people the right to express their opinion for "*concerns for the community*". This Judge made the opinion that Wendy Higgins Chambers never used the term "stalking" or "harassment".

Judge Krumeich:

³The media's use of the words "harassing" and "stalking" in articles or broadcasts in which defendant was interviewed, terms not used by defendant, cannot be attributed to her, although "preying" reasonably may be understood to refer to this sort of criminal activity.

Indeed Wendy Higgins Chambers did not deploy this language and even avoided this language within her pathetic Affidavit submitted in the lawsuit. I believe this older woman is a virtue signaling wannabe social justice warrior targeting me for my websites and that she not only pushed a false story of our one-time encounter but also knowingly persisted with known false information because she was the sole and only woman involved with both media hit jobs. Once again, her visit to police resulted in no Incident Report. **The following events are very telling leaving Hearst with a sole witness with no credibility.**

So myself realizing this person does not have the ultimate power to remove libel from Westport News/Hearst Communications, I choose not to Appeal being financially and emotionally tapped and seek to direct my efforts at Westport News/Hearst. In Sept. 2020 Wendy Higgins Chambers filed a Motion for me to pay her Attorney Fees of **\$16,967.00** for a basic Motion to Dismiss.

II. Conclusion

Wherefore, the defendant by and through her counsel respectfully requests and order granting defendant's Motion for Attorney's Fees and Costs pursuant to C.G.S. § 52-196(f)(1) in the amount of \$16,967.00.

YES \$16,967.00 FOR A MOTION TO DISMISS.

So I write my Objection to Bill of Costs showing my own “costs”, and we then have a scheduled Nov. 24, 2020 Hearing on the Attorney Fees. **At this Hearing the Judge sees that once again that Wendy Higgins Chambers is not present – she is never seen or heard from.** Once again only lead attorney Jessica Wraag is present. The Bill of Costs has 5 other attorneys listed from 2 other law firms. The Bill of Costs also was replete with Emails between Wendy Higgins Chambers and her lead attorney – easily the bulk of the “costs”. **The Judge said I was entitled to question all involved in the costs – including Wendy Higgins Chambers.** The Judge continued the Hearing to a future date in December 2020 with Wendy Higgins Chambers and other attorneys expected to be present for questioning.

Within my Objection to Costs, I presented the Judge with a strong theory about Wendy Higgins Chambers hidden agenda - targeting me for that “*obscure website*” mentioned in Hearst’s article which is sadly a common Social Justice Warrior technique in these troubling times. Given her physical/aesthetic profile this is a real-world possibility. I then concluded by proposing that since the Judge opined that Wendy Higgins Chambers **did not use the word stalk or harass** that she should be reaching out to Hearst/Westport News to disassociate herself from the article for this is easily done in the electronic age. I proposed paying the attorney fees based on proof of this action.

Yet on Dec. 17, 2020, a week before the schedule reconvened Hearing, WENDY HIGGINS CHAMBERS WITHDREW HER MOTION FOR COUNSEL FEES.. Is this sole witness of Hearst no longer feeling like a victim? WHY DID SHE WITHDRAW THE MOTION FOR ATTORNEY FEES IF SHE CLAIMS SHE WAS SOME KIND OF VICTIM? She just got sued for a year and lost \$17,000! What is going on here? Why is this liar not showing up to the Hearing and asking for at least some money? ... like at least get \$10,000 or whatever?

THEORIES:

- 1:** She is being nice after getting the facts about me and the arrest (unlike Hearst) thereby destroying the reliability of Hearst’s only witness to date.
- 2:** **She is afraid to be interrogated by me because I know of her lies and can expose her duplicity possibly causing another lawsuit directed at her.**
- 3:** Hearst following this case advised her not to be questioned now.

None of these very real theories are good news for Hearst.

Meanwhile this Judge Edward Krumeich should be feeling negligent letting this cowardly agenda-driven liar off VIA A BIASED NEW 2018 LAW without a proper trial. Wendy Higgins Chambers is obviously hiding AND AFRAID TO BE QUESTIONED. She easily could have **showed herself** and asked for less money BUT NO - SHE GOES FROM ASKING FOR \$17,000 TO 0 – NOTHING – ZILCH - BECAUSE SHE IS HIDING SOMETHING. **RED FLAG to all Judges afraid to criticize women and give rights of men a proper forum in the extreme time of MeToo. Wake up! Women lie – a lot.**

Would a jury not find this lack of desire to collect \$17,000 in legal fees as strange or "suspicious" to say the least? She is an alleged "victim" .. right? She spent the premeditated time to cause persecution of me (and only her - no other woman) with two major media companies in the area – the most powerful media companies and yet now ... not worth getting compensated for her experience with me? A travel agent in the time of Covid can be potentially compensated \$17,000 and she does what? Ask for nothing?!!! Why not show up and answer questions? Why not show up and ask for less money? **Ghosting the legal system should alarm Judge.** I DESERVE A TRIAL WITH REPORTER SOPHIE C. VAUGHAN AND WENDY HIGGINS CHAMBERS ANSWERING QUESTIONS TO FIND OUT MORE!

DOCKET NO. FST CV20-5022942S : SUPERIOR COURT
 JAMES LAWRENCE : J.D. OF STAMFORD/NORWALK
 VS. : AT STAMFORD
 WENDY HIGGINS CHAMBERS : OCTOBER 9, 2020

MOTION FOR FEES AND COSTS

Pursuant to the Court's Memorandum of Decision dated September 21, 2020 [docket no. 102.03] and under C.G.S. § 52-196a(f), the Defendant, Wendy Higgins Chambers hereby moves for an order of costs and attorney's fees, including costs and fees incurred in connection with the filing of the special motion to dismiss. Under C.G.S. § 52-196a(f)(1), the Defendant, after prevailing on a Special Motion to Dismiss, is entitled to reasonable costs and attorney's fees.

I. Applicable Law and Details on Costs and Fees

General Statutes Section 52-196a(f)(1) state in pertinent part, as follows: "(1) If the court grants a special motion to dismiss under this section, the court shall award the moving party costs and reasonable attorney's fees, including such costs and fees incurred in connection with the filing of the special motion to dismiss...." In its ruling dated September 21, 2020 [docket no. 102.03], the Court ordered the defendant, through counsel, to file proof as to such costs and fees by October 15, 2020. Accordingly, Defendant Ms. Chambers, through counsel, submits the following proof of attorney's fees and costs related to the defense of the plaintiff's lawsuit, which gave rise to attorney's fees and costs as follows:

The undersigned Attorney Jessica Z. Wragg filed an appearance on February 21, 2020 for the defendant Ms. Chambers, after being assigned defense counsel in this matter by defendant's insurance carrier. The attached invoices represent attorney's fees and costs the undersigned has

incurred in connection with defending against the plaintiff's lawsuit, including but not limited to the researching, writing, filing, and argument of the Special Motion to Dismiss and Reply memorandum. These costs and attorney's fees total: \$14,829.50.

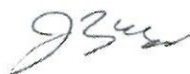
In addition, the undersigned respectfully submits the invoices of plaintiff's personal attorney, Attorney Steven Frederick of Wofsey, Rosen, Kweskin & Kuriansky, LLP, in connection with his representation of the defendant Ms. Chambers in this litigation, for services rendered largely prior to coverage approval by defendant's insurance carrier. Attorney Frederick's fees and costs total \$2,137.50

Therefore, the total fees and costs are: \$16,967.00. In support of this motion, undersigned counsel provides the attached affidavit and invoices (Exhibit A).

II. Conclusion

Wherefore, the defendant by and through her counsel respectfully requests and order granting defendant's Motion for Attorney's Fees and Costs pursuant to C.G.S. § 52-196(f)(1) in the amount of \$16,967.00.

THE DEFENDANT



BY _____

Jessica Z. Wragg
Musco & Iassogna
555 Long Wharf Drive, 10th Floor
New Haven, CT 06511
Tel: (203) 782-4122
jessica.wragg@m-ilaw.com

**THEN THE MYSTERIOUS WITHDRAWAL.
NOT EVEN ASKING FOR LESS OR ANY
MONEY.**

**IS SHE NOT A VICTIM?
AGAIN - WHAT IS REALLY GOING ON HERE?**

WITHDRAWAL

JD-CV-41 Rev. 1-18

STATE OF CONNECTICUT
SUPERIOR COURT
 www.jud.ct.gov

ADA NOTICE
 The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

Docket number FST-CV-20-5022942-S
Return date (For Civil and Housing cases only) Mar-10-2020
Answer date (For Small Claims cases only)

Instructions:

1. Complete this form by selecting any applicable withdrawal categories below.
2. File with the clerk.

Name of case (First-named Plaintiff vs. First-named Defendant)

LAWRENCE, JAMES v. HIGGINS CHAMBERS, WENDY

Judicial District Housing Session Address of court (Number, street, town and zip code)
123 HOYT STREET STAMFORD, CT 06905

Dispositive (Complete) Withdrawal

(Do not check the following two boxes if any intervening complaints, cross complaints, counterclaims, or third party complaints remain pending in this case. See below for partial withdrawal of action.)

(WDACT) The Plaintiff's action is WITHDRAWN AS TO ALL DEFENDANTS without costs to any party.

(WOARD) A judgment has been rendered against the following Defendant(s):

_____ and the Plaintiff's action is WITHDRAWN AS TO ALL REMAINING DEFENDANTS without costs.

Partial Withdrawal

The following pleading(s), motion(s) or other paper(s) in the case named above is or are withdrawn:

- (WDCOMP) Complaint (WAPPCOM) Apportionment Complaint
 (WOC) Counterclaim (WDINTCO) Intervening Complaint
 (WDCC) Cross Complaint (cross claim) (WDTHPC) Third Party Complaint
 (WDCOUNT) Counts of the complaint: _____

(WOAAP) Plaintiff(s): _____

(WOAAD) Complaint against defendant(s): _____ only without costs

(WOM) Motion: **Motion for Counsel Fees (Entry No. 116.00)**
 Other: _____

Signature of Filer(s)

Party **D-01 WENDY HIGGINS CHAMBERS** ; By **MUSCO & IASSOGNA** Attorney or Self-represented party
 Party _____ ; By _____ Attorney or Self-represented party
 Party _____ ; By _____ Attorney or Self-represented party
 Party _____ ; By _____ Attorney or Self-represented party

Name & Address of Filer(s): **JESSICA ZIEMIAN WRAGG**
555 Long Wharf Dr. 10th Floor, New Haven CT

Certification

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on (date) **Dec-17-2020** to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

Name and address of each party and attorney that copy was or will be mailed or delivered to*		<i>For Court Use Only</i>
JAMES LAWRENCE (Self Represented) - 1655 POST RD EAST UNIT 804 WESTPORT, CT 06880		
*If necessary, attach additional sheet or sheets with name and address which the copy was or will be mailed or delivered to.		
Signed (Signature of filer) ▶ 426286	Print or type name of person signing JESSICA ZIEMIAN WRAGG	Date signed Dec-17-2020
Mailing address (Number, street, town, state and zip code) 555 LONG WHARF DRIVE 10TH FLOOR NEW HAVEN, CT 06511		Telephone number 203-782-4122

WHY IS IT THAT THE PUBLIC, OTHER JOURNALISTS, POLICE, AND NOW EVEN HEARST'S LONE WITNESS SEES THAT I WAS AND CONTINUED TO BE **EXTREMELY PORTRAYED DEVOID OF EVIDENCE BUT ACTUAL LEARNED JUDGES REFUSE TO DO WHAT IS RIGHT TO HALT THE UNPROVABLE **PERSECUTION**?**

A TEMPERATE SETTLEMENT OR TRIAL IS IN ORDER FOR HEARST MUST BE PRESSED TO PROVE THEIR LOADED WORDING WITH WITNESSES.