

1 D. GEORGE SWEIGERT, C/O  
336 BON AIR CENTER #241  
2 GREENBRAE, CA 94904

3  
4 IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

5 D. GEORGE SWEIGERT  
6 Plaintiff,

Case No.: 2:18-cv-01633-RMG-BM

7 vs.

8 PLAINTIFF'S SHOW CAUSE MOTION AS TO WHY  
THE DEFENDANT SHOULD NOT BE DEEMED TO  
9 HAVE RECEIVED CONSTRUCTIVE NOTICE OF  
PENDING LAWSUIT

JASON GOODMAN

10 Defendant

11  
12 NOW COMES THE PRO SE plaintiff, a layman non-attorney, to MOTION this Court as to why the  
13 defendant should not be deemed to have been constructively served with notice of this lawsuit. Restated: the  
14 plaintiff requests that this Court deem Jason Goodman, defendant, to have received imputed knowledge of this  
15 instant lawsuit.

16  
17 **MOTION**

18 Defendant Jason Goodman operates at least one YouTube social media channel known as "JASON  
19 GOODMAN". As described in the accompanying PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE  
20 [RJN]", Mr. Goodman, accompanied by two licensed attorneys, has broadcast for publication an extensive analysis  
21 of the original complaint [Doc.1, 6/14/2018, Complaint] to a world-wide YouTube audience. Additionally, Mr.  
22 Goodman demonstrates his proficiency with the PACER court database to locate the original complaint [Doc.1,  
23 6/14/2018, Complaint] in this video broadcast.

24 The RJN includes a copy of the court docket from related litigation. This docket indicates that a draft copy  
25 of the original complaint was forwarded to Mr. Goodman attached to a document known as "Seventh Declaration of  
26 D. George Sweigert, Doc.60, 6/13/2018" (See Steele vs. Goodman, 3:17-cv-00601-MHL, U.S.D.C. for the Eastern  
27 District of Virginia) in the related litigation. Therefore, Mr. Goodman has received an un-docketed copy of the  
28 original complaint several weeks ago.

PLAINTIFF'S SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD NOT BE DEEMED TO  
HAVE RECEIVED CONSTRUCTIVE NOTICE OF PENDING LAWSUIT

**DISCUSSION**

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2 Defendant Goodman has provided publication of this instant lawsuit to himself and almost six thousand  
3 viewers (5.9K+, RJN) on one (of many) of the defendant's YouTube channels. This YouTube publication by the  
4 defendant to himself should be deemed as a self-referential notice of litigation. *Isaiah Walker Jr. v. Harvey Soule*,  
5 138 Mass. (1884), *Heap v. Heap*, 258 Mich. 250, 242 N.W. 252 (1932).

6 The brazen broadcast of the original complaint and PACER entries to the world-wide YouTube audience  
7 should spare the plaintiff of unnecessary expense to serve the summons upon the defendant in this litigation.

**PRAYER**

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9 The plaintiff prays that this Court will deem the defendant Jason Goodman to have received constructive  
10 notice of this lawsuit for the purposes of accruing time to respond to the Amended Complaint [Doc.5, 6/29/2018].

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12 Dated this day of July 2, 2018

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16 D. GEORGE SWEIGERT  
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28 PLAINTIFF'S SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD NOT BE DEEMED TO  
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8 vs.

CERTIFICATE OF SERVICE

9 JASON GOODMAN

10 Defendant


11  
12 CERTIFICATE OF SERVICE

13 On this day, July 2, 2018, I have caused to be placed into the U.S. Postal Service true copies of the  
14 attached pleadings (Notice of Harmless Error, Show Cause Motion, Request for Judicial Notice) with First  
15 Class postage affixed to the following parties.

16  
17 Clerk of the Court  
18 U.S. District Court  
19 Matthew J. Perry, Jr. Courthouse  
20 901 Richland Street  
21 Columbia, South Carolina 29201

22 Jason Goodman  
23 252 7<sup>th</sup> Avenue #6S  
24 New York, NY 10001

25 I hereby attest under the penalties of perjury that the foregoing is true and accurate.

26  
27   
28 D. GEORGE SWEIGERT

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USDC CLERK, COLUMBIA, SC  
2018 JUL -5 AM 11:35