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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**MAX ZWEIZIG,**

Case No. 3:15-cv-02401-HZ

Plaintiff,

**DECLARATION OF TIMOTHY  
ROTE IN SUPPORT OF MOTION TO  
RECONSIDER MOTION TO  
VACATE THE JUDGMENT FOR  
FRAUD UPON THE COURT**

v.

**TIMOTHY C. ROTE**, a citizen of the state of Oregon, **NORTHWEST DIRECT TELESERVICES, INC.**, an Oregon for-profit corporation, **NORTHWEST DIRECT MARKETING OF OREGON, INC.**, an Oregon for-profit corporation, **NORTHWEST DIRECT MARKETING, INC.**, an Oregon for-profit corporation, **NORTHWEST DIRECT OF IOWA, INC.**, an Iowa for-profit corporation, **ROTE ENTERPRISES, LLC**, an Oregon limited liability company, **NORTHWEST DIRECT MARKETING, INC.**, aka Northwest Direct Marketing (Delaware), Inc., a Delaware Corporation, and **DOES 1 through 5**,

Defendants.

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I, Timothy Rote, do hereby declare:

1. I represent myself in the above-captioned case. I make this declaration on personal knowledge and am competent to testify to the matters stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email I received in from Nena Cook finally confirming that the PLF hired her to represent Zweizig and Ware in case 19cv14552.

3. Attached hereto as Exhibit 2 is a true and correct copy of a letter I sent to Judge Kathie Steele noting that on information and belief I believed that the PLF intervened to interfere with my default Judgement against Zweizig and Ware. That position was confirmed by Exhibit 1. My position previously with the court is that (1) one of Kathie Steele's clerks interfering with the default judgment knowingly advanced support for pedophilia and child porn; (2) that her clerk's interference with the default motions violated due process; (3) that interfering with the default judgment by the clerk because she is a member of the LGB community who also sees Zweizig as a member of that community is actionable and not immune; and (4) that the clerk needs to be terminated.

**I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.**

Dated: November 15, 2019

/s/ Timothy C. Rote  
Timothy C. Rote,  
Defendant Pro Se

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing DECLARATION OF TIMOTHY C. ROTE on:

Joel Christiansen, OSB #080561 and other members of the child incest team.

through the Court's electronic filing system on November 15, 2019.

*/s/ Timothy C. Rote*\_\_\_\_\_

Timothy C. Rote,  
Defendant Pro Se