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6 Pro Se Plaintiffs

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF ARIZONA

9 Reverend John W. Stone  
10 Shirley D. Stone,  
11 Plaintiffs

**CASE NO: CV25-04158-PHX-SMB**

**PLAINTIFF S' OMNIBUS MOTION TO VACATE  
ORDER: 1. MOTION TO VACATE VOID ORDER  
RULE 60(b)(3)(4); 2. DEMAND FOR EMERGENCY  
INJUNCTIVE RELIEF (RESCUE OF CHILDREN); 3.  
NOTICE OF DEMAND FOR JUDICIAL RECUSAL  
POST-EMERGENCY RELIEF [28 U.S.C. § 455]  
(EXPEDITED CONSIDERATION REQUESTED)**

12 **v.**

13  
14  
15 Arizona Governor Kathleen Marie Hobbs,  
16 Arizona Attorney General Kristin Mayes, El  
17 Mirage, AZ Police Chief Paul Marzocca, El  
18 Mirage Police Sergeant Matthew Jacobs, Mesa,  
19 AZ Police Officer Damian K. Ryden, El Mirage  
20 Mayor Alexis Hermosilla, El Mirage Municipal  
21 Court Judge Michael Parascandola, CubeSmart  
22 LP, Metropolitan Life Insurance Company,  
23 Maricopa County Superior Court Judge Melissa  
24 Zabor, Maricopa County Superior Court Judge  
25 Jennifer Ryan-Touhill, Maricopa County  
26 Superior Court Michael Herrod, Sarea Laron  
McCree, Brittany Houston, Heiress Dupree,  
Jane and John Does, I-20, all Arizona State  
Government Officials are being sued in their  
Official and Individual Capacity.

Defendants

1 **I. INTRODUCTION**

2 Plaintiffs respectfully move this Court to vacate the May 28, 2026, Order (Doc.  
3 53) in its entirety. This Order is "void ab initio"—a legal nullity from its inception—due  
4 to a structural breach of judicial integrity and a manifest "Fraud upon the Court."  
5 Pursuant to Federal Rules of Civil Procedure 60(b)(3), 60(b)(4), and 60(d)(3), vacatur is  
6 mandatory because the Court exceeded its authority to insulate itself and its co-  
7 defendants from catastrophic civil and criminal liability.

8 The Court's "rigged" Order, in part, to Gift **Defendants Governor Katie Hobbs**  
9 **and Attorney General Kris Mayes and the other defendants,** is fundamentally flawed as  
10 it deliberately suppresses the children's, as well as the plaintiffs' Due Process rights.  
11 Under A.R.S. § 12-612, the decedent's family is entitled to a single, unified wrongful  
12 death action. By blocking the children's participation through the omission of their  
13 status as Statutory Beneficiaries, the Court has effectively joined the kidnapping  
14 conspiracy.

15 The children remain unlawfully detained by the Defendant-mother, and this  
16 Court's Order serves as a judicial barricade, denying them their "day in court" and their  
17 liberty. Furthermore, the Order's false implication that Plaintiffs' claims are unjust  
18 serves only to decimate familial relations, intentionally poisoning the children's  
19 perception of their grandparents to ensure the family's total destruction.

20 **II. THE ORDER AS A CRIMINAL INSTRUMENT REINFORCING ITS VOID STATUS**

21 The May 28th Order is not a judicial finding; it is an instrument of crime designed  
22 to shield kidnappers and obstruct a mandatory rescue.

23 • 18 U.S.C. §§ 241 & 242: The Order constitutes a Conspiracy Against Rights and a  
24 Deprivation of Rights Under Color of Law.

25 • A.R.S. § 13-2409: The Order facilitates the felony of Obstructing Criminal  
26 Investigations by a public official.

1 • A.R.S. § 13-705: The Court's failure to act, just like **Governor Hobbs and**  
2 **Attorney General Mayes** and the other defendants, constitutes a knowing disregard for  
3 **crimes against special-needs children**, a factor that demands the highest level of judicial  
4 scrutiny.

5 Judge Brnovich's "judicial deception"—dismissing the case while demanding an  
6 Amended Complaint tailored to a falsified record—is a reprehensible "lying in wait"  
7 tactic. By coercing Plaintiffs to adopt a fraudulent narrative, the Court is actively  
8 tampering with the judicial record and evidence, rendering the May 28th Order a dead  
9 letter without the force of law.

### 10 **INTEGRATED PLEADING: JUDICIAL DECEPTION ANALYSIS**

11 This Court's usage of "shotgun" approach and Conclusory statements along with  
12 describing this case as complex is nothing more than a smoke screen to introduce its  
13 fraudulent misrepresentations. The FAC, although drafted by the Pro se plaintiffs is  
14 elementary in understanding.

### 15 **III. THE PRIMARY FRAUD: ELIMINATION OF KIDNAPPING AND FELONY MURDER**

16 Judge Brnovich was completely compromised when she denied rescuing the  
17 children after she was fully noticed in the first Emergency Motion filed November 19,  
18 2025. By forcing the children to remain as kidnapped and abused children she did  
19 exactly what the defendants did.

20 The cornerstone of this judicial deception is the Court's intentional elimination of  
21 the "contributing causes" of the decedent's death. Under **A.R.S. § 13-1105(A)(2)**,  
22 kidnapping and child/vulnerable adult abuse are predicate offenses for first-degree  
23 felony murder. Judge Brnovich eliminated these charges even though the kidnapping  
24 with the 54-day period of torture and abuse were recognized, the Civil Rights and  
25 Wrongful Death claims would be unassailable.

26 By suppressing the fact that the decedent was a Type 1 diabetic subjected to  
intentional insulin tampering (attempted murder), and by ignoring the kidnapping,

1 which is ongoing even today, the Court effectively acted as an accomplice after the fact.

2 Judge Brnovich's main objective was to usurp criminal jurisdiction to specifically  
3 adjudicate and dismiss charges that include the attempted murder and subsequent  
4 torturous murder of the decedent, child and vulnerable adult abuse, and the continuing  
5 kidnapping of the decedent's three minor children while still under a protection order.  
6 As set forth throughout this memorandum, the Court usurped its power to draft a  
7 fraudulent narrative—a "colorful" order that effectively deprives the children of their  
8 protection, freedom, property, and familial rights.

9 This Order was corruptly designed to prevent any criminal or civil liability against  
10 the Defendants, including John and Jane Doe State and Federal Law Enforcement and  
11 Judges and others to be named later. Judge Brnovich's colorful order seeks to place the  
12 blame for the decedent's death squarely on his shoulders, intentionally misrepresenting  
13 the facts in the FAC, to minimized what the decedent experience.

14 Judge Brnovich painted a picture of the Plaintiffs as being disgruntled. Judge  
15 Brnovich's acts and omissions did not serve the interest of justice; they actively  
16 furthered the cover-up of the crimes and wrongs listed in the First Amended Complaint.

#### 17 **IV. THE CHILDREN AS STATUTORY BENEFICIARIES AND PARTIES IN INTEREST**

18 The Court's claim that the children "are not parties" is a procedural fraud. Under  
19 **A.R.S. § 12-612**, children are "**Statutory Beneficiaries**" in a wrongful death action.

20 1. Pre-existing Status: The children were petitioning plaintiffs on valid Protection  
21 Orders that did not expire upon their father's death.

22 2. Liberty Interest: Their interest is a 14th Amendment liberty interest. They are  
23 currently falsely imprisoned.

24 3. Vested Interest: As contingent beneficiaries of the MetLife policy, their interest  
25 becomes "vested" under the "**Slayer Statute**" (**A.R.S. § 14-2803**) once the mother is  
26 disqualified.

**V. EXHIBITS OF JUDICIAL DECEPTION: (3) THREE CHARTS.**

The following charts document with specificity how each material misrepresentation and blatant lies were used to twist the narrative of the FAC to fraudulently dismiss it.

**1. SIX (6) "STANDING" MISREPRESENTATIONS**

The plaintiffs are also "Statutory Beneficiaries" under A.R.S. § 12-612. The Court's use of standing as a shield to protect Defendants from discovery is a violation of the Due Process Clause and a structural error.

**The Court's May 28, 2026, order reflects the following Standing Errors:**

	<b>Claim Targeted</b>	<b>Judge's Argument (Doc 53)</b>	<b>FAC Facts / Legal Standard</b>
1	The Children's Rights	Claims Plaintiffs lack standing because the children "are not parties." Pg 18, L 27	Rule 17(c): Plaintiffs are "Next Friends" as the father is deceased, and the mother is a Defendant/Captor.
2	Wrongful Death	Questions standing by implying only the children are statutory beneficiaries. Pg 14, L 18	A.R.S. § 12-612: As parents of the decedent, Plaintiffs have clear statutory standing.
3	Elder Abuse	Claims no standing because MetLife is not a "caregiver." Pg 15, L 12	A.R.S. § 46-451: Standing exists for "Financial Exploitation" by any person/entity.
4	Insurance Fraud	Claims standing was "abandoned" in the pleadings. Pg 14, L 26	FAC Para 207: Count VI specifically pleads and maintains this standing.
5	Rescue Injunction	Claims "facts presented" do not grant standing for emergency relief. Pg 19, L 4	18 U.S.C. § 1201: Ongoing felony kidnapping creates immediate Article III Standing.
6	Civil Rights (§ 1983)	Claims lack of "concrete injury" to the Plaintiffs themselves. Pg 13, L 3	Injury in Fact: Being blocked from family rescue and loss of a son are concrete, personal injuries.

1 Standing is not a tool to be used by a Court to facilitate the ongoing abduction  
2 and kidnapping, pursuant to A.R.S. §§ 13-1304, 13-1302, and 18 U.S.C. § 1201, of minor  
3 children or the concealment of a homicide, pursuant to Felony-Murder and A.R.S. §  
4 13-1105.

5 The public court record in this case evidences Judicial Notices and Motions that  
6 are literally loaded with statutes, laws, rules and procedures, which gave the Court **Fair**  
7 **WARNINGS** of the accomplice liability it could fall under.

8 Judge Brnovich ignored the warnings and chose to Retaliate against the plaintiffs,  
9 children and the decedent contrary to the laws presented. Provided below are fourteen  
10 **(14) misrepresentations** in the Court's Order of May 28, 2026, and there are more.

## 11 2. Acts Of Judicial Deception-Fourteen (14) Misrepresentations

12 The following chart pairs the Order's misrepresentations with the verified facts of  
13 the FAC serves as additional basis for vacatur.

	<b>Order (Doc 53) Misrepresentations</b>	<b>FAC's Verified Facts</b>	<b>FAC Paragraph</b>	
14				
15	1	Claims "no factual allegation" against Mayor Hermosilla. Pg 13, L 3	Hermosilla was noticed 200+ times of the kidnapping and failed to act.	25, 100
16				
17	2	Labels McCree as the "former wife" (implying settled divorce). Pg 2, L 15	McCree was the "estranged wife"; divorce was pending; paternity orders were active.	20, 42
18				
19	3	Claims Court lacks authority to rescue children "under the facts presented." Pg 19, L 4	The Court admitted authority but used misrepresented facts to avoid acting.	(Error), Judicial Admission of Authority / 18 U.S.C. § 1201
20				
21				
22				
23	4	States death was "caused by his diabetes" (Natural/Medical). Pg 14, L 22	Death was not caused by insulin tampering however the attempted murder of January 9, 2024, was.	30, 71, 72
24				
25				
26	5	Claims FAC fails to describe a "concrete conspiracy."	Alleged specific coordinated meeting between Zabor, Ryan-	157, 158

1		Pg 14, L 12	Touhill, and Herrod.	
2	6	Claims Plaintiffs lack	Alleged animus against ADA-	27, 44, 166
3		"discriminatory animus" for	protected disabled and elderly	
4		§ 1985. Pg 14, L 12	Black plaintiffs.	
5	7	Claims no jurisdiction because	Children were Petitioning	91, 126
6		children "are not parties."	Plaintiffs on valid Protection	
7		Pg 18, L 27	Orders being violated.	
8	8	States Slayer Statute requires a	A.R.S. § 14-2803 allows civil	151, 210
9		"judgment of conviction."	determination by	
10		Pg 14, L 18	preponderance of evidence.	
11	9	Claims Plaintiffs "abandoned"	The FAC contains a full Count	207-212
12		the insurance fraud claim.	(VI) for Insurance Fraud.	
13		Pg 14, L 26		
14	10	States MetLife is not a	FAC alleges Financial	207-212
15		"caregiver" for Elder Abuse	Exploitation" of elderly plaintiffs	
16		claims. Pg 15, L 12	(A.R.S. § 46-451).	
17	11	States Plaintiffs were not in a	Plaintiffs were in a zone of	47, 51
18		"zone of danger." Pg 15, L 26	danger regarding the kidnapping	
19			of children they raised.	
20	12	Claims McCree cannot	McCree is a third party to the	197, 168,
21		"tortiously interfere" with the	contractual duty MetLife owes	218
22		policy. Pg 17, L 8	to beneficiaries.	
23	13	Claims no facts show MetLife	MetLife admitted holding funds	148, 151
24		"wrongfully withheld" benefits.	in a "Liability Account" and	
25		Pg 17, L 28	encouraged suit.	
26	14	Dismisses children's rights	Children are "Parties in	124-127,
		because they "are not parties."	Interest", beneficiaries under	188-189
		Pg 18, L 27	ARS § 12-612.	

The Court briefly addresses the "Protection Orders" and uses them to dismiss the kidnapping claims as "civil matters" rather than the violations of valid court orders. Below is how the "protection orders" were omitted.

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### 3. "Protection Order" Omissions

Context of the Mention	The Court's Ruling / Omission
Jurisdictional Dismissal Page 18, Line 27	The Judge mentions the children are not parties to the case, effectively ignoring that the Protection Orders name them as protected persons who are currently being held in violation of those very orders. The Court's refusal to recognize the children's status under the Protection Orders is the primary reason the Order is VOID under Rule 60(b)(4).
State Actor Duty Page 13, Line 10	The Court addresses the "notices" sent to police and officials. While she avoids the specific term "Protection Order" here, she is referring to the 200+ notices sent regarding the violation of those orders and the kidnapping.
RICO / Conspiracy Page 14, Line 5	The Court dismisses the "extortion" claims". This is a manifest omission: she fails to mention that the Protection Orders were active and being used by the Captors as a tool to extort insurance funds for the children.
The Kidnapping is a "Civil custody dispute" Page 2, 15	By failing to name the "Protection Orders" as specific legal documents being violated, she frames the kidnapping as a "civil custody dispute" to avoid federal intervention.

Under the Ninth Circuit standard for pro se litigants, the Court had a duty to read the "orders" and "notices" as a claim that valid state-issued Protection Orders were being willfully ignored by the Defendants.

#### VI. The Supreme Court Standard on Void Judgements

United Student Aid Funds, Inc. v. Espinosa, 559 U.S. 260 (2010), is the modern landmark case on Rule 60(b)(4). The Supreme Court held that a judgment is "void" only in two specific instances:

1. Where the court lacked jurisdiction (subject-matter or personal).
2. Where the court acted in a manner inconsistent with Due Process of law.

#### VII. Ninth Circuit Case Law on Void Judgements

- **United States v. Berke, 170 F.3d 882 (9th Cir. 1999)** The Ninth Circuit held that a

1 judgment is void if it is "so affected by a fundamental infirmity that its infirmity may be  
2 raised even after it has become final." The court specifically identifies lack of due  
3 process as a "**fundamental infirmity.**"

4 • "A judgment is void for purposes of Rule **60(b)(4)** if the court that rendered it...  
5 acted in a manner inconsistent with due process of law."

6 • **Thomas P. Gonzalez Corp. v. Consejo Nacional De Produccion De Costa Rica, 614**  
7 **F.2d 1247 (9th Cir. 1980)** This case establishes that a void judgment is a legal nullity and  
8 that "the court has a non-discretionary duty to grant relief" under Rule **60(b)(4)**.

9 Unlike other Rule **60(b)** motions, the court *must* vacate a void order.

10 • A judgment entered in violation of due process is void. **In re CLS, 252 P.3d 556**  
11 **(Colo.App. 2011); Vets v. Am. Recruiters Enters., 922 So. 2d 1090 (Fla. 4<sup>th</sup> DCA 2006).**

12 • **In re Tuli, 172 F.3d 707 (9th Cir. 1999) Confirms that Rule 60(b)(4)** has no time  
13 limit. Because a void order is "dead" from its inception, it can be challenged at any time.

14 • Procedural Violation: If a judge "blocks access to the court" by misstating the  
15 facts of a pro se complaint, they have committed a procedural due process violation  
16 that renders the resulting order void.

17 • The Defendants (State Officials and Lawyers) used "Judicial Deception" to sanitize  
18 the record. This case supports the idea that the sanitization of the FAC is a form of  
19 misconduct that requires the Order (Doc 53) to be set aside.

20 • **In United States v. Estate of Stone, 2026 U.S. App. Lexis (9<sup>th</sup> Cir. 2026)**, Judge  
21 Brnovich's order reinforces that Rule **60(b)(3)** is the proper vehicle when the "officer of  
22 the court" or an opposing party engages in intentional misrepresentation of the record  
23 to achieve a dismissal.

24 • **Under Rule 60(b)(3)**, this Court must vacate an order obtained through 'fraud,  
25 misrepresentations, or misconduct by an opposing party.' The Ninth Circuit has  
26 established that relief is mandatory where such misconduct prevents a party from 'fully

1 and fairly presenting its case.' **Squarestone v. Squarestone, 65 F.4th 411 (9th Cir. 2023).**

2 • Preventing a Fair Presentation: In **Squarestone**, the court emphasized that fraud  
3 under **60(b)(3)** occurs when the misrepresentation is of such a nature that it obstructs  
4 the litigant's ability to adjudicate the actual merits.

5 Here, by systematically 'sanitizing' the First Amended Complaint (FAC)—  
6 misrepresenting a federal kidnapping as a 'civil custody dispute' and a criminally  
7 induced death as 'natural'—the Defendants and the Court have collaterally prevented  
8 Plaintiffs from presenting the true gravity of the Homicide and RICO claims.

9 • Intentional Misrepresentation of the Record: **As held in United States v. Estate of**  
10 **Stone (9th Cir. 2026), Rule 60(b)(3)** is the proper vehicle to address the deliberate  
11 concealment or 'twisting' of material facts. When the judicial process is used to 'color'  
12 the record and deceive onlookers, the integrity of the court is at stake. The fourteen  
13 (14) misrepresentations, six (6) "standing" misrepresentations, and four (4) protection  
14 orders misuse, documented herein constitute clear and convincing evidence of a  
15 coordinated effort to **suppress the truth**.

16 • Fraud on the Court (**Rule 60(d)(3)**): **While 60(b)(3)** addresses the parties'  
17 misconduct, the Court possesses the inherent power under **Rule 60(d)(3)** to set aside a  
18 judgment for 'fraud on the court.' This occurs when the 'judicial machinery itself' has  
19 been corrupted. The Judge's election to ignore 200+ notices of kidnapping and instead  
20 facilitate the continued captivity of minor children through a 'sanitized' order (Doc. 53)  
21 represents the pinnacle of judicial misconduct. As the Ninth Circuit held in United  
22 States v. Berke, 170 F.3d 882 (9th Cir. 1999), an order so affected by a 'fundamental  
23 infirmity' is a legal nullity and must be vacated.

#### 24 VIII. Substantive Due Process Violations

25 • **Marshall v. Jerrico, Inc., 446 U.S. 238 (1980)** - The Supreme Court ruled that  
26 "The Due Process Clause entitles a person to an impartial and disinterested tribunal."

1 • **Armstrong v. Manzo, 380 U.S. 545 (1965)** - Due process requires the  
2 "opportunity to be heard... at a meaningful time and in a meaningful manner."

3 **A judge** who misrepresents facts in the federal record to protect **judicial**  
4 **colleagues or "gift" a bogus order to defendants** is no longer impartial.

5 This substantive failure strikes at the core of the order's validity. The plaintiffs have  
6 been denied a "meaningful" hearing, rendering the **order void**.

7 **IX. Legal Argument: Void Ab Initio & Constitutional Tort**

8 **1. Substantive and Procedural Due Process (Rule 60(b)(4):** A judgment is void if  
9 the court acted in a manner inconsistent with due process. By "twisting" the FAC to  
10 shield high-profile defendants, the Court committed "**Judicial Deception**"—**a structural**  
11 **defect that renders the entire May 28th Order, Void**.

12 **2. The mistake of the "Catch-22":** The Court's conclusion at Page 18, Lines 27–  
13 **28—that the children are not parties. The Judge is fully aware that the children cannot**  
14 **"join" the case because they are being held in a felony kidnapping environment by the**  
15 **Defendants.**

16 **Under Fed. R. Civ. P. 17(c), the Court has a mandatory duty** to appoint a "next  
17 friend" for unrepresented minors. Instead, the Court used the results of the Defendants'  
18 criminal conduct to justify denying the children protection.

19 **3. Blocking Access to Court (1st and 14th Amendments):** The First Amendment  
20 guarantees the right to petition for redress. By intentionally misstating Plaintiffs'  
21 grievances so they could be dismissed, the Court committed a Constitutional Tort and  
22 effectively blocked Plaintiffs' access to the court.

23 **4. Ethical Conflict: Forcing Plaintiffs to amend their complaint based on the**  
24 **Court's "findings" of false facts is a violation of Fed. R. Civ. P. 11. Plaintiffs cannot**  
25 **adopt the Court's misrepresentations without committing a fraud upon the court.**

26 **5. Concealment of Evidence:** The Court's summary denial of Plaintiffs' pending

1 motions, specifically including the Requests for Judicial Notice, constitutes an  
2 intentional act of concealment designed to suppress unimpeachable evidence of  
3 ongoing criminal conduct.

4         **6.** In this Wrongful Death and Civil Rights suit the Judge had a duty to examine  
5 the criminal conduct that caused the death. The fact that this judge's colleagues' alleged  
6 criminal conduct could be exposed to a jury hearing the case does not warrant a  
7 premature dismissal based on a litany of lies and immunity.

8         **7.** The judge intentionally drafted the order loaded to fully color the public  
9 record. Her motive is crystal clear on its face. These lies were not just  
10 misrepresentations they were cold and calculated to do what they were planned to do.

11 **Judge Brnovich's brazen misrepresentations were meant to color the record, deceive**  
12 **the onlookers, prevent the criminal prosecutions of all of the defendants, keep the**  
13 **defendant's cover-up concealed, keep the children as kidnapped victims.**

#### 14 **X. THE TOTALITY OF CRIMINAL AND CIVIL LIABILITY PRECLUDES DISMISSAL**

15         The Court's May 28, 2026, Order (Doc. 53) erroneously treats this action as a  
16 mere collection of 'conclusory labels' and 'civil disputes.' However, if the verified facts  
17 set forth in the FAC and the November 19, 2025, Emergency Motion were/are accepted  
18 as true—as mandated by the **Rule 12(b)(6)** 'assumption of truth' standard—the liability  
19 facing the Defendants is total, encompassing both federal criminal felonies and  
20 catastrophic civil torts.

21         Criminal Liability as a Matter of Law: The FAC alleges a 'Kidnap-for-Profit' plot  
22 (Para 151, 168) and the criminally induced death of Timothy Paul Stone through insulin  
23 tampering (Para 30, 71). These are not 'labels'; they are specific allegations of Federal  
24 Kidnapping (**18 U.S.C. § 1201**) and Felony Murder. A court cannot dismiss a civil rights  
25 action where the underlying conduct constitutes an ongoing federal felony and a  
26 homicide without first allowing discovery to proceed.

1           The Mandatory Duty to Adjudicate: Because the FAC establishes a 'Structural  
2 Conspiracy' involving State Actors who used their official positions to facilitate  
3 kidnapping and obstruct justice (Para 157, 187), the Defendants have forfeited any claim  
4 to Qualified Immunity. The 'State-Created Danger' doctrine mentioned in the FAC,  
5 applies with full force here, as the Defendants were noticed over 200 times of the  
6 imminent danger and chose to block the rescue.

7           **Dismissal at this stage is legally impossible** because a jury—not a Judge—must  
8 determine the veracity of these life-and-death allegations. To dismiss the case now,  
9 while the children remain captive and the evidence of homicide remains suppressed, is  
10 to grant 'Judicial Immunity' to a continuing crime. The law demands that the FAC be  
11 reinstated so that total liability of these Defendants can be adjudicated on the merits.

#### 12           **XI. Notice Of Demand For Judicial Recusal Post-Emergency Relief**

13           Pursuant to 28 U.S.C. § 455, Plaintiffs demand that the presiding Judge recuse  
14 herself following the immediate rescue of the children. Impartiality is permanently  
15 compromised by the "reciprocal bias" shown in protecting judicial colleagues through  
16 the misrepresentation of verified facts and the suppression of evidence.

#### 17           **XII. Conclusion & Relief Requested**

18           As of this filing, and as defined by law, the children remain falsely imprisoned.  
19 The Court must:

- 20           1. VACATE the Void Order of May 28, 2026;
- 21           2. RE-INSTATE the First Amended Complaint;
- 22           3. ORDER the immediate rescue of the minor children;
- 23           4. RECUSE itself once safety is restored.
- 24           5. *CRIMINAL REFERRAL: Plaintiffs further demand that this Court fulfill its ethical*  
25 *and legal obligations by formally referring the evidence of record—specifically regarding*  
26 *the ongoing Federal Kidnapping (18 U.S.C. § 1201), Felony Murder (A.R.S. § 13-1105),*

1 and Child/Vulnerable Adult Abuse (A.R.S. § 13-3623)—to the United States Attorney for  
2 the District of Arizona and the Civil Rights Division of the Department of Justice for  
3 immediate investigation and prosecution.

4 Respectfully Submitted this 15<sup>th</sup> day of June 2026, by:

5 

6 Reverend John W. Stone

Shirley D. Stone

7 **CERTIFICATE OF SERVICE**

8 I hereby certify that on June 15, 2026, I filed with the Court and served a true and  
9 correct copy of this Omnibus Motion to Vacate Order: 1. Motion to Vacate Void Order  
10 Rule 60(b)(3)(4); 2. Demand for Emergency Injunctive Relief (Rescue of Children); 3.  
11 Notice of Demand for Judicial Recusal Post-Emergency Relief [28 U.S.C. § 455];  
(Expedited Consideration Requested) upon counsel and parties of record by email  
and/or other authorized means as follows:

12 US Attorney Timothy Courchaine  
13 Two Renaissance Square-40 N. Central Avenue, Suite 1800  
14 Phoenix, AZ 85004-4449  
By Certified Mail

15 Kristina Holmstrom  
16 Attorney for Metropolitan Life Insurance Company  
17 2415 E. Camelback Road, Suite 800  
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18 Kate Weeks  
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