

STATE OF MICHIGAN  
OAKLAND COUNTY DISTRICT COURT 52-4

1-800-HANSONS, LLC,  
Plaintiff,

v.

SUSIE WEISS,  
Defendant, Pro Se.

Case No. 25-00555-GC  
Hon. Judge Kirsten Nielsen Hartig

DEFENDANT'S MOTION TO DISQUALIFY COUNSEL

Defendant, appearing pro se, respectfully moves this Court to disqualify Attorney Bryan E. Kontry as counsel of record for Plaintiff 1-800-Hansons, LLC. In support, Defendant states as follows:

I. INTRODUCTION

This case is not merely a dispute over a home improvement contract. It exposes a systemic abuse: the misuse of licensed attorneys of record as mere fronts for unauthorized ghostwriters. Forensic metadata establishes that every pleading filed under the name of Plaintiff's counsel, Attorney Bryan E. Kontry, was in fact authored by unlicensed third parties.

Michigan Court Rules require that pleadings be signed by counsel of record. MCR 2.113(C)(1) mandates that "[e]very document filed shall be signed by the attorney of record," and MCR 2.114(C)(1) provides that the attorney's signature certifies that the attorney has read the document and that it is well-grounded in fact and law. Here, counsel neither authored nor reviewed the documents filed under his name.

Furthermore, under MRPC 3.7 ("Lawyer as Witness"), an attorney who is a necessary witness may not serve simultaneously as advocate. Because Kontry's bar number and

electronic signature were used on documents he did not prepare, he is a necessary witness to the fraud. He cannot continue to serve as Plaintiff's counsel in this matter.

Such a practice is not only fraudulent in this case, but reflects a broader pattern that undermines the integrity of the judicial process itself. This Court cannot permit litigation to proceed on pleadings that are fraudulent in authorship, forged in signature, and unsupported by legitimate counsel of record.

## II. FACTS

1. Every pleading and filing submitted in this case under the name of Attorney Kontry was authored by unauthorized ghostwriters, specifically Jacob Grot and Cora Morgan, as demonstrated by forensic metadata.
2. Attorney Kontry has not authored, reviewed, or filed any pleadings personally. His electronic signature and bar number were applied to documents prepared entirely by third parties.
3. Pursuant to MCR 2.113 and MCR 2.114, pleadings must be signed by counsel of record, certifying that counsel has read and approved them. None of the pleadings meet this requirement.
4. Under MRPC 3.7, an attorney who is a necessary witness may not serve as advocate. Kontry's involvement in allowing his identity to be used makes him a necessary witness.
5. As a result, Plaintiff effectively has no legitimate counsel of record and no valid pleadings before this Court.

## III. ARGUMENT

Under MRPC 3.7 ("Lawyer as Witness"), an attorney who is a material witness cannot serve as advocate in the same proceeding. Attorney Kontry's knowledge of the ghostwritten pleadings and the falsified use of his signature make him a material witness. His continued representation violates this rule and undermines the integrity of the proceedings.

### A. Pleadings Authored by Ghostwriters Are Invalid.

Michigan law requires that pleadings be prepared and signed by the attorney of record. Here, none were. Documents filed under Kontry's name are fraudulent and void.

### B. Kontry Cannot Serve as Both Counsel and Witness.

Kontry's identity and bar number were used on pleadings he did not author. He is a necessary witness to these acts of fraud and cannot simultaneously act as Plaintiff's

advocate.

C. Plaintiff Is Left Without Representation.

With Kontry disqualified and all pleadings fraudulent, Plaintiff has no valid counsel of record and cannot proceed. The case, as filed, collapses.

V. ALTERNATIVE RELIEF

Because Plaintiff is a corporate entity, it is prohibited from proceeding pro se under Michigan law. Should the Court grant this Motion and Plaintiff fail to promptly secure substitute licensed counsel, Defendant respectfully requests dismissal of the action for lack of proper representation. To hold otherwise would constitute a clear error of law and manifest injustice.

IV. SUMMARY OF RELIEF REQUESTED

Defendant respectfully requests that this Court:

1. Disqualify Attorney Bryan E. Kontry as counsel of record for Plaintiff.
2. Strike all pleadings filed under his name and electronic signature.
3. Hold that Plaintiff, having no valid counsel and no valid pleadings, cannot proceed further in this matter.
4. Grant such other and further relief as this Court deems just and proper.

RESERVATION OF RIGHTS

Defendant respectfully notes that the Court has consistently expedited Plaintiff's filings while disregarding or denying Defendant's motions without timely consideration. Such selective treatment raises serious due process concerns and creates the appearance of partiality. Defendant places this on the record to preserve all rights for appellate review.

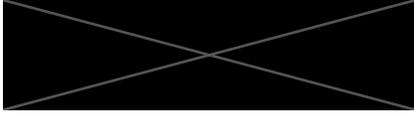
FINAL RESERVATION OF RIGHTS

Defendant has already raised concerns regarding the Court's impartiality and requested recusal. The Court's refusal to step aside, coupled with its ongoing treatment of Plaintiff's and Defendant's filings, creates at minimum an appearance of impropriety. Defendant places this on the record to preserve all rights for appellate and further review.

Respectfully submitted,

/s/ Susie Weiss  
Defendant, Pro Se





Dated: September 4, 2025

STATE OF MICHIGAN

OAKLAND COUNTY DISTRICT COURT 52-4

1-800-HANSONS, LLC,  
Plaintiff,

v.

SUSIE WEISS,  
Defendant, Pro Se.

Case No. 25-00555-GC

Hon. Judge Kirsten Nielsen Hartig

ORDER GRANTING DEFENDANT'S MOTION TO DISQUALIFY COUNSEL  
At a session of said Court, held in Oakland County, Michigan, on \_\_\_\_\_, 2025.

PRESENT: HON. KIRSTEN NIELSEN HARTIG, DISTRICT COURT JUDGE

Upon review of Defendant's Motion to Disqualify Counsel, the supporting exhibits, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Defendant's Motion is GRANTED.

1. Attorney Bryan E. Kontry is hereby DISQUALIFIED as counsel of record for Plaintiff 1-800-Hansons, LLC.
2. All pleadings and filings submitted under his name and electronic signature are hereby STRICKEN as invalid and fraudulent.
3. Plaintiff, having no valid counsel of record and no valid pleadings before this Court, is unable to proceed further in this matter.

IT IS SO ORDERED.

HON. KIRSTEN NIELSEN HARTIG  
District Court Judge

Dated: \_\_\_\_\_, 2025

Prepared by:  
/s/ Susie Weiss  
Defendant, Pro Se

END OF MOTION



STATE OF MICHIGAN  
OAKLAND COUNTY DISTRICT COURT 52-4

1-800-HANSONS, LLC,  
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Defendant, Pro Se.

Case No. 25-00555-GC  
Hon. Judge Kirsten Nielsen Hartig

## **DEFENDANT'S MOTION FOR JUDICIAL NOTICE OF TRIPLE DEFAULT AND LACK OF JURISDICTION**

Defendant, appearing pro se, respectfully moves this Court to take judicial notice of Plaintiff's triple default and the resulting lack of jurisdiction. In support, Defendant states as follows:

### **I. FACTS**

1. Plaintiff failed to properly answer Defendant's Counterclaim.
2. Plaintiff failed to properly answer the original Complaint.
3. Plaintiff failed to respond to discovery requests by the August 7 deadline, resulting in deemed admissions under Michigan Court Rules.
4. Defendant has filed an Extended Counterclaim seeking relief in excess of this Court's jurisdictional limit, requiring transfer to Circuit Court.

### **II. ARGUMENT**

#### **A. Triple Default.**

Under Michigan Court Rules, Plaintiff's failures constitute defaults that deprive Plaintiff of standing to proceed. A party in default cannot pursue claims, and the Court lacks authority to proceed further.

#### **B. Lack of Jurisdiction.**

In addition to Plaintiff's defaults, Defendant's Extended Counterclaim exceeds the statutory jurisdictional limits of the District Court. This Court is therefore divested of jurisdiction, and

jurisdiction lies exclusively in the Circuit Court.

C. Void Orders.

Because of Plaintiff's triple default and the jurisdictional bar, this Court's continued retention of the matter renders all subsequent orders void ab initio. Any attempt to proceed further would constitute a usurpation of jurisdiction.

III. RELIEF REQUESTED

Defendant respectfully requests that this Court:

1. Take judicial notice of Plaintiff's triple default.
2. Acknowledge the lack of jurisdiction resulting from both Plaintiff's defaults and Defendant's Extended Counterclaim exceeding District Court limits.
3. Hold that all further proceedings in this Court are void ab initio.
4. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,  
/s/ Susie Weiss  
Defendant, Pro Se



Dated: September 4, 2025

STATE OF MICHIGAN  
OAKLAND COUNTY DISTRICT COURT 52-4

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Case No. 25-00555-GC  
Hon. Judge Kirsten Nielsen Hartig

**ORDER GRANTING DEFENDANT’S MOTION FOR JUDICIAL NOTICE OF  
TRIPLE DEFAULT AND LACK OF JURISDICTION**

At a session of said Court, held in Oakland County, Michigan, on \_\_\_\_\_, 2025.

PRESENT: HON. KIRSTEN NIELSEN HARTIG, DISTRICT COURT JUDGE

Upon review of Defendant’s Motion for Judicial Notice of Triple Default and Lack of Jurisdiction, the supporting filings, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Defendant’s Motion is GRANTED.

1. Plaintiff’s triple default is judicially noticed: (a) failure to properly answer Defendant’s Counterclaim, (b) failure to properly answer the original Complaint, and (c) failure to respond to discovery requests by the August 7 deadline.
2. Plaintiff’s defaults deprive Plaintiff of standing to proceed and divest this Court of jurisdiction.
3. Defendant’s Extended Counterclaim exceeds the jurisdictional limits of the District Court. Jurisdiction lies exclusively in the Circuit Court.
4. All further proceedings in this Court are declared void ab initio.

IT IS SO ORDERED.

HON. KIRSTEN NIELSEN HARTIG  
District Court Judge

Dated: \_\_\_\_\_, 2025

Prepared by:  
/s/ Susie Weiss  
Defendant, Pro Se

END OF MOTION