

Honorable David G. Estudillo

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

NATHEN BARTON,

Plaintiff

v.

JOE DELFGAUW, XANADU
MARKETING INC., STARTER HOME
INVESTING INC, &
JOHN DOE 1-10

Defendant(s).

CASE NO. 3:21-cv-05610-DGE

REPLY TO DKT 499

Noted for: July 21, 2025

Ms. Van Dusen lied to the court under oath. In Dkt. 500 ¶3 she declared:

Attached hereto as Exhibit B is a true and correct copy of Defendan’s
Answer to Plaintiff’s Seventh Set of Interrogatories to Defendant Joe
Delfgauw.

Like her client, she is not great at fabricating facts and documents. Look at her Exhibit B
(Dkt. 500-2) pages 9-10. She fabricated Exhibit B today, July 20, 2025, forgetting that Microsoft
Word has a date widget that changes pdf files generated to TODAY’S date, July 20, 2025.
Exhibit B was created just TODAY. If she already had the genuine PDF file as she sent it in
June, why would she need to GENERATE the pdf file today? Why would she open the Word
document TODAY, generate the pdf file that was supposedly sent in June, and give that to the

1 Court instead of the correct file already generated last month? She did that because she needed a
2 fabricated document and she forgot about that pesky date code widget. Oops!

3 I have a video showing me opening Ms. Van Dusen’s emailed document, and the
4 responses to Interrogatory #26 as she sent it. Where is hers? I ask the Court for an *in camara*
5 inspection of our respective email tools.

14
15 I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States
16 of America that the foregoing is true and correct. Executed on June 27, 2025.

17 Joseph Delfgaw
18 Joseph Delfgaw

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20
21 **CERTIFICATE OF SERVICE**

22 I DECLARE that on July 20, 2025, I placed for delivery via Email, a true copy of the foregoing
23 Answer to Plaintiff’s Seventh Set of interrogatories to: Nathan Baton at
24 farmersbranch2014@gmail.com. I declare under penalty of perjury under the laws of the State
of Washington that the foregoing statements are true and correct.

25
26 DAWN VANDUSEN
27 Dawn R. Van Dusen
28 2715 Airport Road
29 Adrian, MI 49221

30
31 **Conclusion**

32 Like her client, Ms. Van Dusen was tripped up by a small oversight, a trifling detail, a
33 logical inconsistency. I ask that the Court order an *in camara* inspection of the emails and
34 documents and expose the liar publicly, along with the appropriate sanctions.

1 July 20, 2025

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4 (Nathen Barton)

5 Nathen Barton
6 (360) 241 7255
7 4618 NW 11th Cir
8 Camas WA 98607
9 FarmersBranch2014@gmail.com

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I. CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2025, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF System, which will automatically generate a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF System, which includes the Defendant. The said Notice of Electronic Filing specifically identifies recipients of electronic notice.

/s/ Nathen Barton

Nathen Barton