

FILED

01/06/2026

Gallatin County Justice  
Center

Bowen Greenwood  
CLERK OF THE SUPREME COURT  
STATE OF MONTANA

515 S. 16<sup>th</sup> Ave., Room 1254  
Bozeman, MT 59715  
Case Number: PR 26-0001

Rienne H. McElyea  
District Judge  
Eighteenth Judicial District  
Dept. 2



January 6, 2026

Chief Justice Cory Swanson  
Montana Supreme Court  
215 N. Sanders St.  
Helena, MT 59601

Re: Norwood v. Gallatin County Sheriff Deputy Broker, Gallatin County Sheriff's Department, Gallatin County Cause No. DV-2025-511, New Motion

Dear Chief Justice Swanson,

I am required to refer to the Montana Supreme Court any matter in which a party files an affidavit alleging facts showing personal bias or prejudice of the presiding judge pursuant to § 3-1-805, M.C.A. Please find enclosed a new Plaintiff's Motion for Reconsideration & Motion for Recusal and Affidavit.

Very truly yours,

Rienne H. McElyea

c: Calvin Stacy (via email)  
Paula Norwood (via email)  
Gallatin County Clerk of District Court (via email)

- FILED -

12/15/2025

Sandy Erhardt

CLERK

Gallatin County District Court

STATE OF MONTANA

By: Jacqueline Majors

DV-16-2025-0000511-DS

McElyea, Rienne H.

Paula Norwood

(your name)

6903 Shannon Drive

(your street address)

Austin, Texas 78724

(city, state, zip code)

(512) 375-3101

(your phone number)

MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT,

(number of district in which your county is located)

Gallatin COUNTY

(name of your county)

Paula Norwood,

Plaintiff,

vs.

Gallatin County Sheriff Deputy Broker,  
Gallatin County Sheriff's Department,

Defendant.

) **Your Case No. DV-25-511**

)

)

) **Motion for Reconsideration &**

) **Motion for Recusal**

)

(name of your motion describing what you want the Court to do)

)

)

)

)

I, Paula Norwood, respectfully request that the Court enter an Order  
(print your full name)

that does the following:

The Plaintiff request a Motion for Reconsideration for all of her motions and order, which includes a Motion for a Request for Discovery, a Motion to Appear Remotely, a Motion for a Change in Venue, and a Motion for a Gag Order. The Plaintiff believes she is being subjected to bias which is favoring the Defendants in this case because the Defendants in this case or essentially the judges co-workers and because all the motions and order filed in this case were all denied and every action the Plaintiff request is all denied by this judge the plaintiff believes she is experiencing bias because for example one of the items being requested is a motion for discovery because of the nature of why the Plaintiff filed this case, the Plaintiff believes she should be entitled to discovery since she was falsely charged in the criminal case that is tied to this civil case, except in this case that was denied by the judge in this case. The Plaintiff believes the judge should recuse herself from the case and someone new needs to be assigned to this case in order for the Plaintiff to be able to have an impartial judge in this case.

Change in Venue

The Plaintiff would like to clarify that she understands now she cannot have a Change in Venue to another state, however the Plaintiff would like to request a Change in Venue to another county in Montana so that she can have a fair chance at having an impartial jury to hear her case because the situation already seems like she cannot get a fair trial in the City of Bozeman in Gallatin County.

#### Gag Order

The Plaintiff believes a Gag Order is necessary because of the nature of the Defendants and other people in Bozeman creating a smear campaign against the Plaintiff and she does not want a jury to be prejudice or for more negative verbiage to be continually communicated about the Plaintiff and this case to others including the media that could negatively impact her case because of this.

#### Appear Remotely

After everything that happened to the Plaintiff in the State of Montana, the Plaintiff will not be stepping one foot into Montana because she has been traumatized from the events that transpired against her and because of what happened to the Plaintiff. The Plaintiff has not been able to find new employment. The Plaintiff is currently homeless with no income and even if it was possible the Plaintiff does not have the means to be traveling back and forth from Texas to Montana for the duration of the case and so a motion to appear remotely is necessary since the Plaintiff will not be coming to Montana for any reason.

#### Discovery

Because the Defendants in this case were part of the law enforcement officers who were involved in the Plaintiff being arrested in a criminal case that was against the Plaintiff. The Plaintiff believes it is well within her rights to be able to request discovery from the Defendants since they had an active role in contributing to her false arrest and false imprisonment. Even though the Montana Highway Patrol was the arresting agency they were assisted by the Gallatin County Sheriff's Office and as such the Plaintiff believes she has the legal right to request a motion for a request for discovery for all the records, information, videos, and various other items that are tied to her arrest for the purposes of this case to not only show evidence and proof of all the infractions the Gallatin County Sheriff's Office is guilty of. Because the Plaintiff is not a lawyer and is doing this case as pro se she mistakenly used the request for discovery statute designated for a criminal case and not a civil case. So, the Plaintiff respectfully clarifies that her Motion for a Request for Discovery is now being requested by MCA Rule 26, Montana Rules of Civil Procedure 26(b)(1).

The Plaintiff would like to utilize **MCA 3-1-805** to request that the judge in this case be recused from this case and if possible the Plaintiff would like to request that all county and district court judges in Gallatin County be recused from this case due to the fact that there decision maybe bias based upon the fact that the Defendants in this case are considered to be there co-workers and as such the probability of them making a non-bias decision in this case, in the Plaintiff's opinion, is very unlikely and so the Plaintiff would like a judge that has no affiliations with Gallatin County or law enforcement to make decisions in this case because that is why the Plaintiff had requested

a Change in Venue because she believed she could not receive a fair trial in this case. The Plaintiff believes the judge that is assigned to this case is not impartial and is favoring the Defendants side in this case which is not fair to the Plaintiff in this case.

I would like a hearing before the Court on this Motion.

I have filed the following documents along with this Motion:

My Affidavit in support of this Motion.

A proposed Order for the Court's signature.

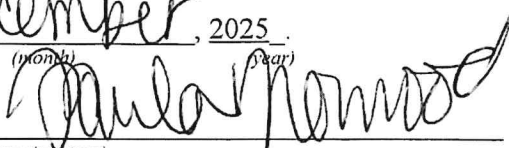
My Affidavit of Service, which indicates how I served copies of these documents

on the opposing party.

Other: \_\_\_\_\_

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Dated this 8th day of December, 2025.  
(date) (month) (year)

  
(Your signature)

Paula Norwood  
(print your name)

- FILED -

December 15, 2025

Sandy Erhardt

CLERK

Gallatin County District Court

STATE OF MONTANA

By: Jacqueline Majors

DV-16-2025-0000511-DS

McElyea, Rienne H.

Paula Norwood

*(your name)*

6903 Shannon Drive

*(your street address)*

Austin, Texas 78724

*(city, state, zip code)*

(512) 375-3101

*(your phone number)*

MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT,

*(number of district in which your county is located)*

Gallatin COUNTY

*(name of your county)*

Paula Norwood,

Plaintiff,

vs.

Gallatin County Sheriff Deputy Broker,

Gallatin County Sheriff's Department,

Defendant.

Your Case No. DV-25-511

AFFIDAVIT

I, Paula Norwood, swear (or affirm) under oath that: \_\_\_\_\_  
*(print your name)*

The Plaintiff feels like she cannot receive a fair trial or treatment from any judge working at Gallatin County whether county or district court judge. The Plaintiff respectfully request that all the judges in Gallatin County be recused from this case as there is a very likely probability of a bias decision being made against the Plaintiff. The Plaintiff request a Change in Venue to another county in Montana other than Gallatin County because the Plaintiff believes based on the smear campaign that was created against her she would not have an impartial jury if this case went to trial in Gallatin County and because of that the Plaintiff respectfully request for a Change in Venue to be approved by a different judge with unbiased views of this case. The Plaintiff believes the judge that is assigned to this case is not impartial and is favoring the Defendants side in this case which is not fair to the Plaintiff in this case.

