IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

FREDERICK SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Lot 0116 Square 0503 Plaintiff, v. OKSANA SHEMET SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Respondent.	CASE NO. 2025-CAB-004804 OPPOSITION TO MOTION TO DISMISS

COMES NOW Plaintiff, FREDERICK J. SHADDOCK, acting pro se, respectfully submits this Affidavit that he never signed such a Quick Claim Deed (Exhibit A - Affidavit) and to bring to the Court's attention to new evidence that demonstrates the fraudulent nature of the purported Quit Claim Deed PDF (Exhibit B - Bogus doc) which "***should have had a barcode on it... Usually at the top ... On the right hand side***", according to Veronica the Legal Instrument Examiner for the Recorder of Deeds (RoD) for Washington DC. (Exhibit C - Call transcript).

The DC Superior Court has subject matter jurisdiction over any action regarding the possession of real property, or to quiet title to real property according to D.C. Code § 11-921(a)(6),(7). An action to void a forged deed is a classic quiet title action. Furthermore, the Lis Pendens statute, D.C. Code § 42-1207, is a tool available in the Civil Division to provide notice of a claim affecting title.

Defendant's motion fundamentally mischaracterizes this action. Plaintiff is **not** asking the Court to conduct the final equitable distribution of marital property. Plaintiff seeks two specific, legally distinct forms of relief that fall within this Court's authority:
1) A declaratory judgment that the purported "Quit Claim Deed" dated December 7, 2013, is void due to forgery and failure to comply with DC recording statutes; and
2) An order for a Notice of Lis Pendens to provide constructive notice of this claim against the title.

1. Defendant's Counsel has refused to produce the alleged paper Quick Claim Deed for inspection.

As shown in Exhibit D (Demand) , Plaintiff has demanded since dated April 23, 2025 (over 5 months) to physically inspect the original document to verify its authenticity. He requested proof that the alleged QCD was filed with the Recorder of Deeds, at the DC Government Office, just 1 block from the marital condo. The digital PDF shows no RoD Bar Code and date on or around December 7, 2013. Defendant and Counsel have never complied with these requests. This refusal to produce the original for inspection is highly suspect. If the document were legitimate, there would be no reason to deny a simple request to examine it, or produce a receipt from the Recorder of Deeds. This conduct suggests a recognition that the original document cannot withstand scrutiny.

2. The original Complaint To Void Quit Claim Deed For Defects include:

Signature irregularities, ink inconsistency, absence of Recorder of Deeds registration, lack of alleged payment of $1, deceased Notary Public, no witnesses, and lack of photos typically taken by both parties for major events. Plaintiff would have consulted an attorney for such an important $200000+ transaction. Since the couple own 2 marital properties, it is not believable that the husband would sign a Quit Claim Deed on the DC condo, yet not demand that

the wife sign a reciprocal QCD for their Fairfield Iowa house where she currently enjoys full marital rights.

3. Defendant has engaged in a pattern of attempting to destroy evidence related to this dispute.

The credibility of the Quit Claim Deed is further destroyed by Defendant's concurrent actions in the related Iowa based divorce proceeding. As detailed in the Exhibit E (Emergency motion), Plaintiff has in the Iowa District Court (Case No. CDCV402064) concerning Defendant's recorded unauthorized access to Plaintiff's computers. She deleted files related to this very Quit Claim Deed issue and the divorce proceedings.

A party confident in the legitimacy of a document does not withhold or secretly delete related files. This act of spoliation of evidence powerfully suggests that Defendant is actively trying to suppress the truth and hinder Plaintiff's ability to defend his property rights, knowing the deed is fraudulent.

4. Conclusion

Plaintiff never signed the alleged Quit Claim Deed.
Defendant and her attorney refuse to produce the original alleged Quit Claim Deed for inspection.
They have not produced proof of filing around the date of the document with the Recorder of Deeds.
Defendant deleted digital evidence related to the alleged Quit Claim Deed while she was in their Iowa home and Plaintiff was in their DC condo..
Counsel had not provided a reason that a routine Lis Pendens should not be recorded for the property in dispute.
Counsel's claim of lack of service is disingenuous because he receives all motions via DC Courts eFile and just responded to one.

This is not the behavior of a party relying on a legitimate, unambiguous, mutually-agreed-upon, legal agreement. A vigorous legal defense would not be required. It is the behavior of a desperate party engaged in a scheme to claim 100%, not the standard 50% of marital properties upon divorce. Defendant evidently wants both marital homes, not just one. Petitioner has agreed to give her preferred home upon divorce, but not both homes, leaving him homeless.

The document was never recorded. Under D.C. Code § 42–401, an unrecorded deed is invalid as against subsequent purchasers and creditors. The failure to record this document for over 12 YEARS, and its absence from the public record, proves the PDF was never intended to be a legitimate, enforceable conveyance of real property, but rather a fraudulent artifact created to mislead.

Defendant forged Plaintiff's electronic signature on a Motion to Dismiss the divorce case in Jefferson County Iowa on 3-11-2025 in an effort to stay married (Exhibit F - Fake doc) requiring him to quickly make a motion to continue with the divorce, which continues to this day (Exhibit G - Get going again).

Plaintiff's consistent and established ties to the District of Columbia reinforce this Court's jurisdiction. Contrary to Defendant's claim of sole Iowa residency, both parties have filed their joint Federal and District of Columbia income tax returns using the address of the subject property, 520 N Street SW, Suite S-316, every year since its purchase in October 2012, including for the most recent tax year (Exhibit H). This longstanding, official conduct demonstrates that both parties have consistently treated the District of Columbia, and this specific property, as their marital domicile for legal and tax purposes.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court take judicial notice of this supplemental evidence, deny Defendant's Motion to Dismiss and allow this case to proceed to a hearing on the merits where the authenticity of the Quit Claim Deed and any registration can be properly examined at the hearing on October 9th.

In the mean time, Plaintiff prays that the Court will order the Defendant to ask Harbour Square Management or June-August renter Elias Rosenthal to return his marital elevator key fob that takes him to and from the 3rd floor and unit S-316. She has unlawfully restricted his movement since September 10. Meanwhile she enjoys total freedom of movement and access at the marital Iowa house.

Respectfully submitted,
October 1, 2025

/s/Frederick J. Shaddock
Frederick Shaddock, pro se
Email: fred@shaddock.net
Phone: 202-365-6100

Exhibit A - Affidavit that Plaintiff never did (or would) sign such a one-sided Quit Claim Deed on 1 of 2 marital properties.
Exhibit B - Bogus Quit Claim Deed PDF - obviously a forgery - even without the original paper
Exhibit C - Call transcript with DC Recorder of Deeds officer saying the QCD "should have had a Bar Code" at the top right.
https://Shaddock.net/video/OksanaQCD
Exhibit D - Demand to Defendant's Counsel to see an original paper document of the PDF and its registration with Recorder of Deeds
Exhibit E - Emergency Motion in Fairfield Iowa Court to stop Defendant in the marital Fairfield Iowa house from deleting documents from Plaintiff's computers
Exhibit F - Fake Motion by Defendant to Dismiss the Jefferson County Iowa Divorce case, forging Plaintiff's signature on 3-112025
Exhibit G - Get going again the divorce with Plaintiff's emergency response to the Jefferson County Iowa Court on 3-20-2025 which proceeds to this day.
Exhibit H - IRS Joint tax return for Plaintiff and Respondent at 520 N Street SW, S-316

CERTIFICATE OF SERVICE

I, Frederick J. Shaddock, hereby certify that on October 1, 2025, I served a true and correct copy of the OPPOSITION TO MOTION TO DISMISS upon counsel for Defendant, Robert Case Liotta, via electronic mail at his designated business email address: rcl@ldelaw.com and
Oksana Shemet Shaddock, Respondent (via electronic filing: OksanaShaddock@Gmail.com)

Respectfully submitted,

/s/Frederick J. Shaddock
Frederick J. Shaddock, Plaintiff pro se