

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION**

**JOHN WILLIAM LICCIONE,**  
Plaintiff,  
v.  
**CATHY SALUSTRI-LOPER,**  
Defendant.

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Case No.: 24-003939-CI

**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

Plaintiff, JOHN WILLIAM LICCIONE ("Plaintiff"), pro se, pursuant to Florida Rule of Civil Procedure 1.190(a), hereby moves this Court for leave to file a Second Amended Complaint, a proposed amended complaint which is attached hereto as Exhibit A, and in support states as follows:

1. Plaintiff originally filed this action against Defendants Julie Marcus, Whitney Fox, Mark Weinkrantz, Cathy Salustri-Loper, Patrick Heinzen, and Jennifer Griffith.
2. Defendant Jennifer Griffith was subsequently transferred by the Court to a separate action now pending under Case No. 24-002994-CI.
3. Plaintiff has voluntarily dismissed Defendants Marcus, Fox, Weinkrantz, and Heinzen, leaving Cathy Salustri-Loper as the sole remaining defendant.
4. Plaintiff filed a Motion to Lift Stay on April 1, 2025, which remains pending before the Court.
5. Plaintiff now seeks leave to file a Second Amended Complaint, pending a favorable ruling on his currently pending Motion to Lift Stay, which:

- a. Removes dismissed/transferred defendants;
- b. Adds two new defendants: (i) Thomas Loper, the husband of Defendant Cathy Salustri-Loper and co-owner of The Gabber Newspaper and its parent company Thursday Morning Media, Inc; and (ii) Thursday Morning Media, Inc., the parent company of The Gabber Newspaper;
- c. Adds a new claim for Defamation and Defamation by Omission (Count I);
- d. Removes all other previously asserted causes of action, with the exception of:
  - i. A fully re-formed Tortious Interference with Prospective Economic Advantage (now repleaded as Count II); and,
  - ii. A fully re-formed Civil Conspiracy (now re-pleaded as Count III);.

7. These amendments are based on newly discovered facts and evidence arising from additional wrongful acts by defendants after the first amended complaint was filed, including a continuation of the Defendants wrongful acts during Plaintiff's recent Gulfport mayoral election held on March 11, 2025. The amendments are necessary to conform the pleadings to the current status and posture of the case and the latest material facts and circumstances.

8. This amendment is sought in good faith, without undue delay, and is not for purposes of prejudice or harassment. The new defendants are closely related to the current defendant and The Gabber Newspaper, and all allegations arise from the same nucleus of operative facts pertaining to Defendant Salustri-Loper, her husband and business partner Thomas Loper, and the media properties they own: Thursday Morning Media, Inc. and The Gabber Newspaper.

9. Florida courts favor liberal amendment of pleadings in the interest of justice. See Dausman v. Hillsborough Area Reg'l Transit, 898 So. 2d 213, 215 (Fla. 2d DCA 2005).

**WHEREFORE**, Plaintiff respectfully requests that this Court:

- A. Grant Plaintiff leave to file the attached Second Amended Complaint;
- B. Accept it as the operative pleading in this matter;
- C. Order the Stay lifted.
- D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

**/s/ John W. Liccione**  
John W. Liccione  
Plaintiff, Pro Se  
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Attached: **EXHIBIT A**: Second Amended Complaint

#### **CERTIFICATION OF COMPLIANCE WITH MEET AND CONFER ORDER**

Pursuant to the applicable rules and administrative orders of the Sixth Judicial Circuit, I hereby certify that I and Defendant Salustri-Loper's counsel James Lake made a good faith effort to meet and confer on this motion and did in fact meet and confer on April 2, 2024 via email. Defendant Salustri-Loper opposes this motion.

**/s/ John W. Liccione**

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Leave to File a Second Amended Complaint has been served via the Florida e-Filing Portal and via email to all relevant parties on this 12<sup>th</sup> day of April, 2025.

**/s/ John W. Liccione**