

FILED
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CLERK
U.S. DISTRICT COURT

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

**PLAINTIFF'S RESPONSE to ECF 197 &
ECF 200**

Case No.: 2:24-cv-00421-DBB-JCB

Plaintiff Russell Greer comes now and says the notion and assertion that Plaintiff was trying to get witnesses to violate anything is absurd.

1. Defendants never once signaled they intended to subpoena or depose Greer's witnesses.
2. Greer never told witnesses to not show up to the deposition, rather he told them to hire an attorney.
3. Greer said he would fight the subpoena because Hardin does not have free reign to a fishing expedition and should have at least let Greer know the topics he wished to depose of.
4. Greer apologizes for any improper communication to opposing counsel, but it was incredibly unprofessional for Hardin to go behind Greer's back without even giving him notice or what Hardin intended to depose witnesses of.

Matthew D. Hardin is Again Violating the Protective Order

Lastly, Mr. Hardin complains of being called unethical, when Hardin has violated the protective order 3x in this case so far. In Hardin's very own ECF notices (194, 197 & 200), he has published the names and PRIVATE EMAIL ADDRESSES & PHONE NUMBERS OF THE WITNESSES. He has not redacted anything, thus proving why Plaintiff was hesitant to provide anything to begin with because he knew Mr. Hardin would do this, just based on past dealings with him. A kiwi farm user has already contacted plaintiff and taunted him with the un redacted information. So yes, by those actions, Hardin has engaged in unethical conduct by not redacting private information and is therefore an unethical person. This is an established fact by Defendants' counsel's own actions. Plaintiff stands by that fact.

If any sanctions are to be imposed, it should be against Defendants. Plaintiff will be moving for sanctions against Matthew D. Hardin in a separate motion.

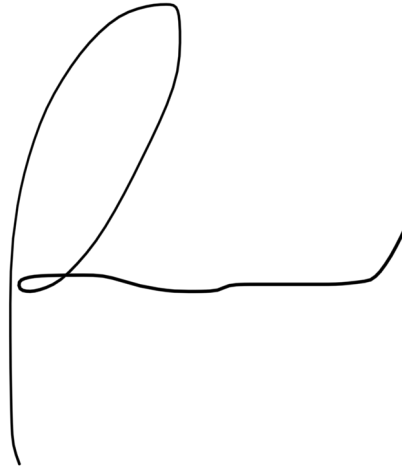
Respectfully

DATED: December 20th, 2024

Russell Greer

/rgreer/

Pro Se

A handwritten signature in black ink, consisting of a large, looped initial 'R' followed by a horizontal line that ends in a small upward curve.

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on December 20th, 2024, I served a true and correct copy of the attached document by ECF to all attorneys on record

