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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendant.

**DEFENDANTS’
NOTICE OF SUPPLEMENTAL
AUTHORITY**

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

District Judge David Barlow
Magistrate Judge Jared C. Bennett

NOW COME the Defendants, by and through undersigned counsel, and file this Notice of Supplemental Authority. Defendants note that the Motion for Attorneys Fees they filed earlier today, ECF No. 228, indicated that Plaintiff had not responded to Defendants’ correspondence relating to a possible stipulation as to the amount of fees which were compensable under this Courts Order at ECF No. 218.

The Plaintiff responded a few minutes later. His response is attached hereto.

DATED February 11, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin
Attorney for Defendants

From: Russell Greer RussMark@gmail.com
Subject: Re: Declaration re: Fees and Costs
Date: February 11, 2025 at 11:09 AM
To: Matt Hardin matthewdhardin@gmail.com

RG

Sir,

Respectfully, I'm not paying you a dime.

You, yourself, told me you refused to safeguard any information. You in turn published private information. That in turn caused kiwi farm users to stalk me.

I complied with everything. There is no reason why I am being forced to pay this.

The only person who never complied with anything was you. You violated the SPO.

I am prepared to appeal the hell out of this.

Sent from my iPhone

On Feb 10, 2025, at 8:15 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I note that our motion for fees in this case is due tomorrow if we have not reached a stipulation. As indicated previously, if I am forced to file a motion, our costs will necessarily escalate as such a motion will require more of my time at \$300 per hour.

Best,

Matthew D. Hardin

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The information contained in this message may be privileged. It is intended by the sender to be confidential. If you suspect you may not be the intended recipient, please notify the sender and delete all copies.

On Jan 17, 2025, at 2:50 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer.

Pursuant to the Court's Order at ECF No. 218, please see attached my declaration relating to costs and fees incurred. The total amount reflected as being due as of this moment is \$5,559.76. Note that this amount relates to the show cause regarding your initial disclosures only, and does not relate to any other discovery dispute relating to the request, including those which remain outstanding relating to requests for production of documents.

Also note that we are entitled to additional funds for the reasons set forth in paragraph 15 if you elect to force us to file additional pleadings, including but not limited to any formal motion to force payment of these sums or any response to objections you file with the District Court.

We look forward to your cooperation with the magistrate's order and expect you will want to discuss a stipulation within the next 14 days. If you do not wish to discuss a stipulation, of course, the amount due will go up with further proceedings.

Best,

<Declaration Fees Moon Greer with exhibits.pdf>

Matthew D. Hardin

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