

1 IN THE UNITED STATES BANKRUPTCY COURT FOR THE CENTRAL DISTRICT OF
2 CALIFORNIA RIVERSIDE DIVISION

3
4 **In Re BRIAN DENNIS MARTIN**

Chapter 7 Case No. 6:25-bk-10944-MH
Adversary No.6:25-ap-01055-RB

5
6 **DAVID TYLER MOSS and
7 FIDELISSIMUS, LLC,**

**DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO
MODIFY DISCOVERY PERIOD**

8 **Plaintiffs,**

Date: January 13, 2026

9 **vs.**

Time: 2:00PM

10 **BRIAN DENNIS MARTIN,**

Courtroom: 303

11 **Defendant.**

PLACE: 3420 12th Ave., Riverside CA

12
13 **Opposition to Motion to Modify Discovery Period**
14 **TO THE HONORABLE MAGDALENA BORDEAUX, JUDGE OF THE UNITED STATES**
15 **BANKRUPTCY COURT.**

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18 **I. INTRODUCTION AND SUMMARY OF OPPOSITION**

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20 Defendant hereby opposes Plaintiff’s Motion to Modify Discovery Period filed on December 17,
21 2025, which seeks an extraordinary 120-day extension of the discovery cutoff date currently set for
22 December 31, 2025. Defendant’s opposition is based on the following grounds:

- 23
24 1. Plaintiff has failed to demonstrate good cause as required under California Code of Civil
25 Procedure § 2024.020 and § 2031.310;
26 2. Plaintiff failed to meet and confer in good faith before filing the motion as required by
27 California Code of Civil Procedure § 2016.040;
28

- 1 3. Discovery is substantially complete with only minor items remaining;
- 2 4. The requested extension would cause substantial prejudice to Defendant; and
- 3 5. Plaintiff’s motion is based on speculation rather than concrete facts.

4 As detailed below, Plaintiff’s motion represents an improper attempt to engage in fishing
 5 expeditions and harassment through discovery after failing to diligently pursue discovery during
 6 the original 60-day period. Accordingly, Defendant respectfully requests that this Court deny
 7 Plaintiff’s motion in its entirety and award sanctions against Plaintiff for this abuse of the discovery
 8 process.
 9

10 **II. STATEMENT OF FACTS**

11
 12 **A. Current Discovery Timeline and Status**

13 The Court established a 60-day discovery period in this matter, with a cutoff date of December 31,
 14 2025. On December 17, 2025—merely two weeks before the discovery cutoff date—Plaintiff filed
 15 the instant motion seeking an extraordinary 120-day extension of the discovery period. This request
 16 comes after Plaintiff failed to diligently pursue discovery during the original period.
 17

18 **B. Discovery Completion Status**

19
 20 Discovery in this matter is substantially complete. Defendant has fully responded to all of
 21 Plaintiff’s discovery requests, producing all relevant and non-privileged documents and
 22 information within the scope of permissible discovery. Specifically, Defendant has:

- 23 1. Produced documents responsive to Plaintiff’s First Request for Production
- 24 on 12/13/2025;
- 25 2. Responded to Plaintiff’s Requests for Admission on 12/13/2025;
- 26 3. Produced all relevant third-party information within Defendant’s possession, custody, or
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control.

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In total, approximately 95% of all discovery has been completed, with only minor items remaining. The outstanding discovery that Plaintiff claims to need relates to third parties over whom Defendant has no control, and much of this information has already been provided to Plaintiff through Defendant’s document productions.

C. Meet and Confer History

Defendant has made multiple good faith attempts to meet and confer with Plaintiff regarding discovery issues. Specifically, Defendant sent emails to Plaintiff’s counsel on 11/10/25, 11/18/25, 11/19/25, 11/21/25, 11/24/25, and 12/13/25. requesting to discuss any outstanding discovery issues and offering to resolve any concerns without court intervention. (See Exhibit A, Emails from Defendant to Plaintiff’s Counsel.) Despite these repeated attempts, Plaintiff’s counsel largely ignored Defendant’s communications and made no reciprocal efforts to meet and confer. Plaintiff filed the instant motion without engaging in any meaningful meet and confer process as required by California Code of Civil Procedure § 2016.040. Plaintiff’s motion contains no declaration detailing any meet and confer efforts, because no such efforts were made.

D. Pattern of Harassment and Abuse

Plaintiff has engaged in a pattern of harassment and abuse toward Defendant throughout this litigation. This includes online harassment via Plaintiff’s YouTube channel, which contains prison threats and AI-generated videos featuring Defendant’s face and voice stating false information. One such video shows an AI-generated image of Defendant in front of a prison bus. Plaintiff has also demonstrated abusive behavior toward Defendant’s family members and has engaged in conduct that Defendant has reported to the FBI and IC3 as potential extortion.

1 **E. Third-Party Discovery at Issue**

2 Plaintiff claims they need additional time to obtain discovery from the following third parties:

- 3 1. **Google, LLC**
- 4 2. **Force Media, LLC**
- 5 3. **Kevin Martin**
- 6 4. **Carolyn Martin**
- 7 5. **David Martin**
- 8 6. **Bitcoin Depot Operating, LLC**
- 9 7. **Coinbase, Inc.**
- 10 8. **Cryptobase, LLC**
- 11 9. **LSGT Services, LLC**
- 12 10. **YouTube, LLC**

13
14
15 However, all relevant information related to these entities that is within Defendant’s possession,
16 custody, or control has already been provided to Plaintiff. The additional discovery Plaintiff seeks
17 constitutes an obvious fishing expedition with no connection to the matters at issue in this case.
18

19 **III. LEGAL ARGUMENT**

20
21 **A. Plaintiff Lacks Good Cause Required Under California Law**

22 California Code of Civil Procedure § 2024.020 establishes the timeline for completion of
23 discovery, and any modification of these deadlines requires a showing of good cause. Plaintiff
24 bears the burden of demonstrating good cause for the requested extension but has failed to meet
25 this burden.
26

27 Good cause requires a showing of diligence and that the need for additional discovery could not
28

1 have been anticipated earlier in the discovery period. *Greyhound Corp. v. Superior Court*,
2 California Supreme Court, 1961. Plaintiff has failed to demonstrate either element.

3 First, Plaintiff has not been diligent in pursuing discovery during the original 60-day period.

4 Plaintiff waited until the last minute to request this extension, despite having ample opportunity to
5 conduct discovery earlier. This lack of diligence alone is sufficient grounds to deny the motion.
6

7 Second, Plaintiff has not shown that the requested discovery is relevant to the claims or defenses in
8 this case. The third parties from whom Plaintiff seeks discovery have minimal, if any, connection
9 to the issues in dispute. Plaintiff's motion is based on speculation rather than concrete facts
10 demonstrating the necessity of this discovery. The same speculation they are seeking here was
11 already decided in a Texas state court where Plaintiffs lost in appeal due to lack of evidence. It is
12 no different here other than harassment, attempts at duplicate litigation, and requesting documents
13 already in their possession. The core issue is if the debt is dischargeable or not – and not to further
14 harass and abuse defendants job and source of income post discharge of June 3, 2025 where
15 defendant has been fully transparent to Plaintiffs through and through. Plaintiffs are simply
16 ignoring the trustee's findings and adding their own abusive allegations.
17

18 Third, Plaintiff's delay in seeking discovery was caused by their own strategic choices and poor
19 case management. Plaintiff should not be rewarded for this lack of diligence by receiving an
20 extraordinary 120-day extension.
21

22 **B. Plaintiff Failed to Meet and Confer in Good Faith**

23 California Code of Civil Procedure § 2016.040 requires parties to meet and confer in good faith
24 before filing discovery motions. This requirement is not a mere formality but a substantive
25 obligation designed to resolve discovery disputes without court intervention.
26

27 Plaintiff failed to engage in any meaningful meet and confer process before filing this motion.
28

1 Despite Defendant’s multiple attempts to initiate discussions regarding discovery issues (see
2 Exhibit A), Plaintiff’s counsel ignored these communications and proceeded directly to filing this
3 motion.

4 The meet and confer requirement demands a “reasonable and good faith attempt at informal
5 resolution of each issue presented by the motion.” Townsend v. Superior Court, California Court of
6 Appeal, 1998. Plaintiff made no such attempt here. This failure alone provides sufficient grounds
7 for denying Plaintiff’s motion.
8

9 **C. Discovery Extension Would Cause Substantial Prejudice to Defendant**
10

11 Granting Plaintiff’s requested 120-day extension would cause substantial prejudice to Defendant.
12 California Code of Civil Procedure § 2023.010 identifies misuses of the discovery process,
13 including using discovery methods to harass or cause undue burden or expense.

14 The requested extension would allow Plaintiff to continue a pattern of harassment and abuse that
15 has characterized their approach to this litigation. This includes their continued threat to defendants
16 job and reputation. Plaintiffs have unclean hands on record in this case already by filing fraudulent
17 original petitions where they purposely deceived this court the facts of the judgments and the
18 position of the 2016 judgment in appeal. As detailed above, Plaintiff has already engaged in online
19 harassment via their YouTube channel, including prison threats and AI-generated videos containing
20 false information about Defendant. <https://www.youtube.com/@brianmartinlawsuitarchive>
21

22 Plaintiff has demonstrated abusive behavior toward Defendant’s family members. (EXHIBIT B)
23

24 Moreover, the requested discovery constitutes an improper fishing expedition. Plaintiff has not
25 articulated any specific, relevant information they expect to obtain from the third parties listed in
26 their motion. Instead, Plaintiff appears to be seeking to prolong discovery to increase costs and
27 burden on Defendant and threaten defendants job and reputation. (EXHIBIT C)
28

1 **D. Current Discovery Period Was Adequate and Discovery is Substantially**
2 **Complete**

3 The current 60-day discovery period was adequate for the needs of this case, as demonstrated by
4 the fact that Defendant was able to complete all necessary discovery within this timeframe.
5 Approximately 95% of all discovery has been completed, with only minor items remaining.
6 Defendant has fully complied with all discovery obligations, producing all relevant and non-
7 privileged documents and information within the scope of permissible discovery. In contrast,
8 Plaintiff has failed to diligently pursue discovery during the original period and now seeks an
9 extraordinary extension to compensate for their own lack of diligence.
10
11

12 **E. Plaintiff's Motion is Based on Speculation Rather Than Facts**

13 Plaintiff bears the burden of proving that good cause exists for the requested extension. However,
14 Plaintiff's motion is based on speculation rather than concrete facts. Plaintiff has not articulated any
15 specific, relevant information they expect to obtain from the third parties listed in their motion, nor
16 have they explained how this information is necessary to their claims or defenses.
17

18 The law requires more than mere speculation to justify a discovery extension. Plaintiff must
19 demonstrate that the requested discovery is likely to lead to the discovery of admissible evidence
20 that is relevant to the claims or defenses in this case. Plaintiff has failed to make this showing.
21

22 Any other such information they are seeking from defendants family is already in their possession.
23 The law can not simply expect to compel parties to submit what they do not have. Plaintiffs tried
24 this tactic before and it ended in extreme abuse. Defendant has nothing more to give and defendant
25 gave more than Plaintiffs were requesting including defendants business documents that they were
26 not expecting.
27
28

1 Defendant is confident that Plaintiffs will not benefit in discovery until the core issue is deposed
2 upon. The core issue meaning Robert D Wilson, who did fraud on the court in the 2016 judgment,
3 and Marko Princip who did the actual fraud in the case, along with an excessive jury charge
4 defendant can prove exists. Speculating anything else is a waste of this court's time and further
5 complicates trial matters when Plaintiffs are seemingly trying to forum shop a second bite at the
6 apple in duplication of litigation, which Plaintiffs already asked this court to decide Texas State
7 matters on a case they lost which is improper to these proceedings.
8

9 **IV. ALTERNATIVE RELIEF**

10 If the Court is inclined to grant any extension of the discovery period, Defendant respectfully
11 requests that such extension be strictly limited in scope and duration. Specifically, Defendant
12 would be willing to stipulate to the completion of specific, limited discovery items within a 14-day
13 time-frame, rather than the 120-day extension requested by Plaintiff and Plaintiff's attorney must
14 communicate and not ignore defendant simply because defendant is stuck representing himself due
15 to current lack of funding.
16

17 This limited extension would allow for the completion of any truly necessary discovery while
18 preventing the prejudice and abuse that would result from Plaintiff's requested 120-day extension.
19

20 **V. REQUEST FOR SANCTIONS**

21 Pursuant to California Code of Civil Procedure § 2023.010 and § 2023.020, Defendant respectfully
22 requests that the Court impose enhanced sanctions against Plaintiff for their misuse of the
23 discovery process and failure to meet and confer in good faith.
24

25 Plaintiff's conduct constitutes a pattern of discovery abuse and bad faith, as evidenced by:
26

- 27 1. Plaintiff's failure to diligently pursue discovery during the original period;

- 1 2. Plaintiff's failure to meet and confer in good faith before filing this motion;
- 2 3. Plaintiff's pattern of harassment and abuse toward Defendant and Defendant's family
- 3 members; and
- 4 4. Plaintiff's attempt to use discovery as a means of harassment rather than legitimate fact-
- 5 finding.

6 Accordingly, Defendant requests that the Court award monetary sanctions in the amount of
7 \$ _____ as the court deems just.

9 **VI. CONCLUSION**

10 For the foregoing reasons, Defendant respectfully requests that the Court:

- 11 1. Deny Plaintiff's Motion to Modify Discovery Period in its entirety;
- 12 2. In the alternative, limit any extension to specific discovery items to be completed within 14
- 13 days;
- 14 3. Award enhanced sanctions against Plaintiff in the amount of \$ _____ and:
- 15 4. Grant such other and further relief as the Court deems just and proper.

16 Respectfully submitted,

17 Dated: December 19, 2025



Brian Martin

Defendant, In Pro Per

DECLARATION OF BRIAN MARTIN

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I, Brian Martin, declare as follows:

- 1. I am the Defendant in this action and have personal knowledge of the facts stated herein. If called as a witness, I could and would testify competently to these facts.
- 2. I have fully complied with all of my discovery obligations in this case, producing all relevant and non-privileged documents and information within the scope of permissible discovery.
- 3. I have made multiple good faith attempts to meet and confer with Plaintiff’s counsel regarding discovery issues, including sending emails on 11/10/25, 11/18/25, 11/19/25, 11/21/25, 11/24/25, and 12/13/25. requesting to discuss any outstanding discovery issues. True and correct copies of these emails are attached as Exhibit A.
- 4. Plaintiff’s counsel has largely ignored my communications and has made no reciprocal efforts to meet and confer.
- 5. Plaintiff has engaged in a pattern of harassment and abuse toward me throughout this litigation, including online harassment via Plaintiff’s YouTube channel, which contains prison threats and AI-generated videos featuring my face and voice stating false information.
<https://www.youtube.com/@brianmartinlawsuitarchive>
- 6. Plaintiff has also demonstrated abusive behavior toward my family members and has engaged in conduct that I have reported to the FBI and IC3 as potential extortion.
- 7. All relevant information related to the third parties listed in Plaintiff’s motion that is within my possession, custody, or control has already been provided to Plaintiff.
- 8. The additional discovery Plaintiff seeks constitutes an obvious fishing expedition with no connection to the matters at issue in this case. Defendant is losing temper over the constant abuse and false allegations of Plaintiff which are heavy violations of the law.
- 9. Plaintiffs are using vexatious litigation and abusive discovery tactics to try and silence me by

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making false allegations that they hope lead to contempt hearings as Plaintiffs are aware that I have a valid defense and I can win the adversary by proving there was never any fraud from my side.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 19, 2025, at CORONA, California.



BRIAN MARTIN

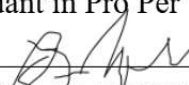
CERTIFICATE OF SERVICE

1 I hereby certify that a true and correct copy of the foregoing opposition motion to modify
2 Discovery Period was served upon the following parties by the method indicated below on
[12/19/2025]:

3 **MARK S. ROSEN**
Attorney at Law
4 27281 Las Ramblas, Ste. 200
Mission Viejo, California 92691
5 Tel: (714) 285-9838
email: MarkSRosen@aol.com; markrosen@markrosenlaw.com

- 6 By hand delivery
- 7 By United States mail, postage prepaid
- 8 By overnight delivery service
- 9 By facsimile transmission
- By electronic mail
- 10 By electronic filing through the Court’s CM/ECF system

11 **Dated:** DECEMBER 19, [2025]

12 **BRIAN D. MARTIN**
Defendant in Pro Per
13 By: 
14 **BRIAN D. MARTIN**

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
941 Cimarron Lane, Corona, CA 92879

A true and correct copy of the foregoing document entitled (*specify*): _____
DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION TO MODIFY DISCOVERY PERIOD - December 19, 2025

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 12/19/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforuptcy.com
trustee.bui@shulmanbastian.com, C115@ecfbis.com
marksrosen@aol.com, pattielegalasst@aol.com, ustpregion16.rs.eft@usdoj.gov, xbrianmartinx@gmail.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 12/19/2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Magdalena Reyes Bordeaux
United States Bankruptcy Court
Central District of California
3420 Twelfth Street, Suite 365 / Courtroom 303
Riverside. CA 92501-3819

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/19/2025 Holly Martin
Date *Printed Name*


Signature

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EXHIBIT A

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17/12/2025, 17:30

Gmail - Re: Brandon harassment and stalking



M <xbrianmartinx@gmail.com>

Re: Brandon harassment and stalking

1 message

M <xbrianmartinx@gmail.com>
To: Mark Rosen <marksrosen@aol.com>

Mon, Nov 10, 2025 at 12:10 PM

Mr Rosen,

It was an absolute pleasure speaking with you today. I thank you for your time, and from now on you will see a more patient email from me regarding anything. I believe this call was just what was needed. Regardless, I am sending you attachments of extortion from Brandon Keating. Brandon Keating is aware and has always been aware that I can teach or manage people to make revenue on YouTube and any other social media source. My brother Kevin being one of those I taught which is what Brandon really wants me to do for him. With that said I will not reach out to Brandon via anything if you are accessible that would be preferred.

Below is a link to where you may view the video. You'd have to watch the whole thing. Brandon recorded this and published it to his Youtube channel. Keep in mind Kevin just started learning about YouTube business and Brandon Keating knew this and took full advantage of Kevin while Kevin was drunk in this call and even Brandon acknowledged Kevin was intoxicated and didn't know if the chat was a good idea. Now, because of Kevin's worsening alcoholism I took it upon myself to distance myself from him and Kevin does not really want to do anything anymore because of your client's treatment and harassment of him and the family.



Regarding Settlement - I do not have 1.3 Million lying around however Brandon mentioned the money can be paid down over time if they get 25% of any business revenue I have. I felt that was fair to talk down the 18 Million total despite them only wanting 1 Million back in 2016 in a lawsuit I had no idea existed in its full capacity until 1 week before that trial. I recorded a call with Marko, it is 7 minutes the link is below. Marko could be subpoenaed. We can set up joint depositions with Marko Princip and Robert Wilson. Robert Wilson's sworn witness statement confirms fraud on the court for the 2016 case which is in appeal in the 5th circuit. Strong evidence.



Below is a video of Brandon using my face in AI in a prison jumpsuit however his voice is clearly shown and he does admit that the jury charge was excessive and without a fraud finding. "Being really bad in court". There are a number of holes in these judgments and cases (one reversed because non proven damages) so we can assume Brandon Keating's party can be vexatious, etc.



If you need anything from me Mr. Rosen, I am 100% willing and able to assist during our discovery period. (I would prefer settlement as I am working and building my life back up and am well capable of it)
Thanks again for the call and your patience.

Kind regards
Brian Martin

On Mon, Nov 10, 2025 at 10:27 AM M <xbrianmartinx@gmail.com> wrote:

<https://mail.google.com/mail/u/0/?ik=51c54edb2d&view=pt&search=all&permthid=thread-a:r-7319201087040640725%7Cmsg-a:r-4814521540435372...> 1/2

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17/12/2025, 17:29

Gmail - BRIAN MARTIN - Our call Nov 18, 2025



M <xbrianmartinx@gmail.com>

BRIAN MARTIN - Our call Nov 18, 2025

1 message

M <xbrianmartinx@gmail.com>
To: Mark Rosen <marksrosen@aol.com>

Tue, Nov 18, 2025 at 1:39 PM

Mr Rosen,

Thank you for the call, I did not want to take too much of your time on this. I wanted to save this portion for email. The motion for clarification is necessary not just for the appeals that should continue but also because ever since June 2025 - I have been taking steps weeks and months to prepare to create my own business/LLC and job. As a 41 year old man who must have income and not really going to do any other jobs I decided to step out of the commission shoes and acquire business and start building up.

As I previously stated, Kevin Martin is not interested in pursuing his business anymore because of Brandon Keating's attacks. Holly, my wife, in the same boat. I on the other hand will not quit my job or my determination to build myself up after the discharge. Therefore purchases have been made to build business. Because of the discharge, it's offered me a chance to start taking steps on a fresh start - hence the need for clarification.

I will also await the settlement information email.

If you need anything, please let me know. Thanks again for your time.

Kind regards
Brian Martin

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17/12/2025, 17:28

Gmail - MOTION FOR PROTECTIVE ORDER DRAFT



M <xbrianmartinx@gmail.com>

MOTION FOR PROTECTIVE ORDER DRAFT

1 message

M <xbrianmartinx@gmail.com>

Wed, Nov 19, 2025 at 4:00 PM

To: Pattie Limon <pattielegalasst@aol.com>, Mark Rosen <marksrosen@aol.com>

Mr Rosen,

Please review the motion for Protective order draft. These are without exhibits but I will add these upon filing this motion. I am emailing to meet and confer about this so we can avoid unnecessary court time. I plan to file this with the court on Friday by the end of the day. Please take note that we must confer before I file. Your client's admissions requests and document requests are not proper. I can say 95% of that will not be answered because it has already been produced and answered in DC-20-09893

The Exhibits for my motion will be :


- a video of Brandon Keating extorting Kevin Martin knowing that Kevin Martin owns his own business and created his own channel.
- an email screenshot of Plaintiffs counsel Dan Wyde calling me a coward and a pussy during the DC-20-09893 case.
- A copy of the latest joint status report where you stated 'motions to compel' which was before discovery. I take that as a serious threat, btw.
- A video clip Brandon Keating made of me using unauthorized AI video of my face and voice stating untrue facts about Bankruptcy fraud.

I will remain aggressive until your clients stop harassing me at the workplace as they harassed Kevin and my wife who let me remind everyone we all have a right to do what we want on YouTube and its a dynamic website to work on so there is no such thing as a legal conclusion in terms of what accusations your clients continue to insinuate.

Please let me know a convenient day and time we can discuss this, if I do not hear back I will file the Motion for Protective Order.

Thank you,

Kind regards
Brian Martin

 **Motion for Protective Order-BRIAN MARTIN.pdf**
197K

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M <xbrianmartinx@gmail.com>

Brian Martin Request for Admissions and Documents SUBMISSIONS

1 message

M <xbrianmartinx@gmail.com> Sat, Dec 13, 2025 at 1:12 PM
To: Mark Rosen <marksrosen@aol.com>, markrosen@markrosenlaw.com, Pattie Limon <pattielegalasst@aol.com>

Mr Rosen,

Attached is the ZIP file that will lead you to all the requested Documents and the Admissions Request. Please email me a receipt that you received these attachments.

Furthermore, there are declarations attached. I suggest your clients take warning that if they interfere with my job, my company, and my company's channel, I will sue them. Should anything happen to Future Media, LLC and its existing YouTube channel that was acquired legally I promise hell on Earth to your clients. I will report everything to the Nevada Attorney General. It is against the law to even interfere in such a way directly toward a Nevada LLC. I will report FDCCA violations to the **Consumer Financial Protection Bureau (CFPB), the Federal Trade Commission (FTC), your State Attorney General, or a consumer protection attorney**

The focus of this case is not my job. I have been working on YouTube for 15 years as a manager, artist, editor, etc. That is my job - it will not be mocked with a fake badge of fraud on it. I will sue EVERYONE who threatens my job security anymore and continues to harm my reputation and the reputation of others on the YouTube platform. My company bought a YouTube channel fair and square and at this current time I am doing everything to make it successful. PERIOD. If anyone doesn't belong on YouTube, it is your clients - and I will do what it takes to expose their fraud.

Fidelissimus, LLC information is below. I am going to require proof that this company was actually a listed company collector as there is still no such proof that this company had judgments transferred to it.

<https://www.bizapedia.com/tx/fidelissimus-llc.html>

In any case, if they did not, then this would be fraud and I, my wife, and anyone this company attacked will sue Brandon Keating, John-Paul Keating, and Malachi Keating for these false representations.

Regarding settlement, I have emails that Brandon offered 1.3 Million and said he can "GET" everyone on board with it. Your offer for 6 Million is soundly rejected. There is enough evidence to show that this case will go down to zero as I have all the evidence for summary judgment to prove your clients frauds and the vexatious litigation acquiring judgments which were obtained by fraud. Even further I will prove to the court Robert Wilson, an attorney who pretended to be my lawyer, is the forefront of the fraud that initiated all of this and I will make sure every single debt the 2016 judgment is terminated along with the collection cases down to zero. Not to mention Marko Princip was discharged for the same debt - your clients obviously think they can harass and attack me and not the one who actually frauded them (Marko Princip) in the first place. All I did was run a YouTube channel for Marko under a promised payment and that is NOT ILLEGAL. I will do everything to make your clients pay for what they have done if these cases do not stop.

For this 6 Million dollar insulting offer, and you ignoring my counter offer - The price went down to \$250,000 and as I discussed it will be paid "OVER TIME". I suggest your clients take it before they end up with civil and criminal charges for the fraud they have done. If your clients think I am bluffing, just wait until the attorney general's review the documents.

If there is anything you think is missing in my documents, please let me know. Everything you requested is attached. If I see your clients openly harass me or my family on their social media things will certainly get ugly. I suggest quick settlement, end this asap and everyone needs to move on with their lives. I am not in prison, I have been trying to WORK and earn a living for YEARS and so has everyone I have worked with or FOR. Your clients will NOT INTERFERE AGAIN

PLEASE GUIDE YOUR CLIENTS APPROPRIATELY OR THEY WILL HAVE CONSEQUENCES FURTHER THAN WHAT IS ALREADY COMING THEIR WAY

Regards
Brian Martin

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EXHIBIT B

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Futuristichub Lawsuit & Trial Archive

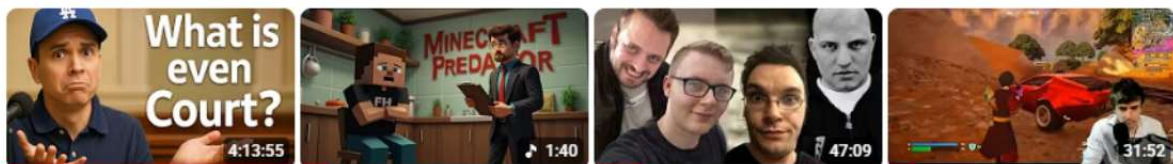
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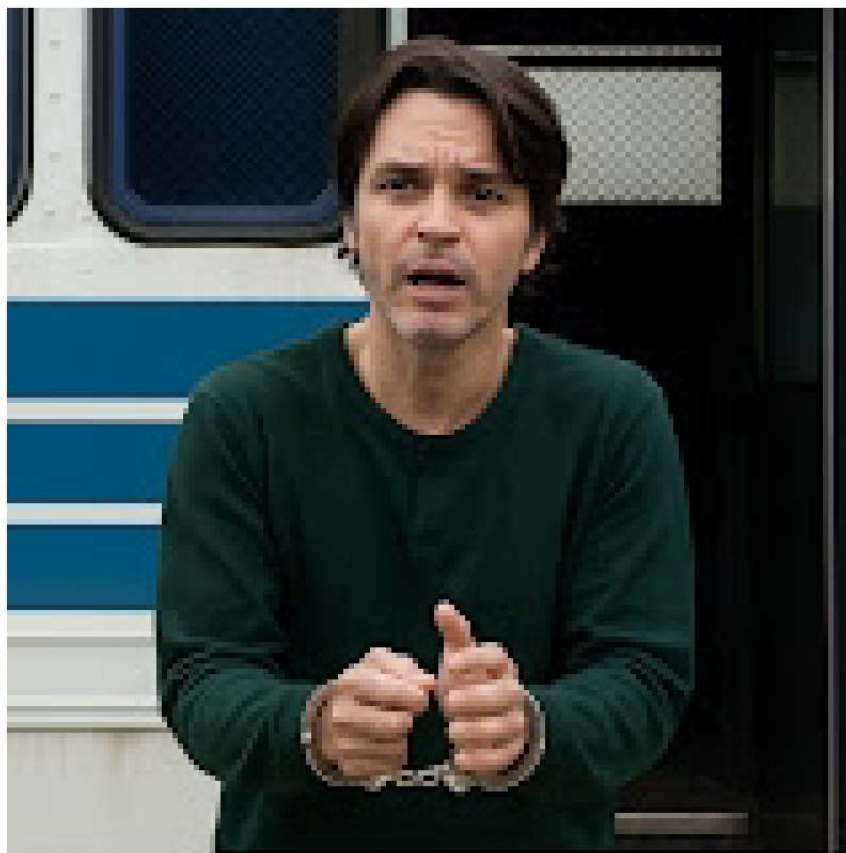


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EXHIBIT C

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2 Yes, YouTube is widely considered a real job, especially when it generates significant
3 income, requiring skills in content creation, marketing, editing, and business
4 management, but it's often more like being a self-employed entrepreneur or small
5 business owner than traditional employment due to income variability and responsibility
6 for all aspects. Many creators treat it as a full-time career, managing production,
7 analytics, and brand deals, and earning taxable income just like any other
8 profession. 

9 Why it's a job:

- 10 • **Income & Taxes:** Earnings from ads, sponsorships, and memberships are taxable,
11 and the IRS often treats creators as self-employed individuals.
- 12 • **Business Skills:** It involves numerous roles: videographer, writer, editor, marketer,
13 salesperson, and business manager, requiring significant effort and skill.
- 14 • **Full-time Commitment:** Successful YouTubers dedicate substantial hours, managing
15 a complex operation similar to a media company, with some even leaving traditional
16 jobs for it. 

17 Why it's different from traditional jobs:

- 18 • **Self-Employment:** Creators are independent contractors, responsible for their own
19 taxes, expenses, and benefits, unlike salaried employees.
- 20 • **Income Instability:** Earnings can fluctuate wildly, and platforms can change policies,
21 making it less secure than traditional roles.
- 22 • **Entrepreneurial Hustle:** It requires constant self-promotion, audience engagement,
23 and adaptability to algorithm changes, blending creative work with business
24 ownership. 