

Matthew D. Hardin (*pro hac vice*)
HARDIN LAW OFFICE
101 Rainbow Drive # 11506
Livingston, TX 77399
Telephone: (202) 802-1948
Email: MatthewDHardin@gmail.com
Attorney for Defendants
Joshua Moon and Lolcow, LLC

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

<p>RUSSELL GREER, Plaintiff,</p> <p>v.</p> <p>JOSHUA MOON, <i>et al.</i> Defendants.</p>	<p>DEFENDANTS’ MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF’S “MOTION FOR SANCTIONS UNDER FED. R. CIV. P. 37(c)(1)”</p> <p>Case No. 2:24-cv-00421-DBB</p> <p>District Judge David Barlow Magistrate Judge Jared C. Bennett</p>
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NOW COME Defendants, Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and oppose Mr. Greer’s “MOTION FOR SANCTIONS UNDER FED. R. CIV. P. 37(c)(1)” ECF No. 424. Defendants state as follows:

1. The Plaintiff has filed so many motions for sanctions against undersigned counsel that Mr. Greer has apparently forgotten his earlier motions. In the most recent attempt, Mr. Greer states he has never before sought sanctions under Fed. R. Civ. P. 37. But that’s transparently false and shows only how cavalier Mr. Greer has become in making untrue and unresearched allegations of wrongdoing against undersigned counsel. This Court’s docket reflects (as Mr. Greer’s own memory should also) that Mr. Greer sought sanctions under Rule 37 at ECF No. 263. That motion was denied, with the Court expressly holding that Mr. Greer’s motion was filed under Rule 37. ECF No.

272 at 5, n. 18 (“The court also notes that, contrary to Defendants’ assertion, Mr. Greer’s motion for sanctions was brought under Fed. R. Civ. P. 37(b)...”). Defendants have no idea why Mr. Greer falsely states his latest motion (almost two hundred docket entries later) is the first one he has filed seeking sanctions under Rule 37.

2. This Court’s rules prevent what Mr. Greer has done (twice) in rushing to seek Rule 37 sanctions without first seeking to resolve any disagreement in the normal meet and confer process. Specifically, DUCivR 37-1 requires that “The parties must make reasonable efforts to resolve a discovery dispute arising under Fed. R. Civ. P. 26 through 37 before seeking court assistance.” And the rule provides that parties must confer before such a motion can be filed. *Id.* But Mr. Greer ignored his obligations to confer, as is also his pattern. See, e.g., ECF Nos. 156-1 (relating to Mr. Greer’s failure to confer under Rule 26), 196-1, 196-1, 196-3, 196-5 (all relating to Mr. Greer’s failures to confer under Rule 37), 382 (Mr. Greer states he only wants to hear from defense counsel “in connection with potential settlement discussions...”).¹ And Mr. Greer has not provided any prompt written communication to undersigned counsel either, setting forth the basis for his supposed grievances. Mr. Greer prefers simply to burden the Court and the Defendants in the first instance, with no attempt whatsoever to follow the rules or even to research his own prior filings.

3. Leaving aside that Mr. Greer’s motion is based on a false premise and is filed in violation of this Court’s rules, Mr. Greer is also simply wrong. As Defendants have

¹ Just yesterday, Mr. Greer decided he wanted to engage in a formal meet and conferral regarding potential retransfer of this case to Florida or transfer to Ohio. Exhibit C. But as undersigned counsel was drafting this Opposition, Mr. Greer canceled that meet and confer. Exhibit A. This follows almost a month of correspondence with Mr. Greer, in which he has repeatedly claimed he does not understand or needs repeated what questions undersigned counsel has posed. Exhibit B.

now explained in their responses to Mr. Greer's serial motions to strike witness disclosures (ECF Nos. 408, 413, 430), each potential witness Defendants have disclosed has relevant knowledge. Each and every witness has knowledge of Mr. Greer's financial situation, including but not limited to facts which would require the mandatory dismissal of this case pursuant to 28 U.S.C. § 1915 (e)(2). Natalie Banks has additional knowledge relevant to a fair use inquiry. There is nothing improper about Defendants' disclosure of these individuals, but there is a great deal that is improper about Mr. Greer's pre-emptive attempts to sidestep what he thinks will be unflattering evidence and to seek sanctions against defense counsel at every turn.

WHEREFORE, Defendants respectfully submit that Mr. Greer's latest motion for sanctions should be denied. Alternatively, because Defendants have been denied the opportunity under DUCivR 37-1 to confer regarding Mr. Greer's concerns, Defendants request this Court identify any concerns it has in an order to show cause, so that Defendants can appropriately respond.

DATED January 5, 2026.

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants

Joshua Moon and Lolcow, LLC



From: Russell Greer russmark@gmail.com
Subject: Re: Amazon Corporate Witness Disclosure
Date: January 5, 2026 at 6:13 PM
To: Matthew Hardin matthewdhardin@gmail.com

I decline your meet and confer.

On Dec 30, 2025, at 7:18 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

I decline to do so.

Matthew D. Hardin

Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 30, 2025, at 10:16 AM, Russell Greer <russmark@gmail.com> wrote:

Please explain the relevance.

Sent from my iPhone

On Dec 30, 2025, at 7:14 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

I have another witness disclosure to make:

Name: Unknown Custodian of Records for Amazon, Inc.
Address: c/o Amazon, Inc., 440 Terry Ave N, Seattle, WA 98109
Phone: (206) 266-1000

Scope of Knowledge: Records pertaining to *Why I Sued Taylor Swift: and How I Became Falsely Known as Frivolous, Litigious and Crazy*, including “free look” on Amazon, Kindle Edition, sales figures, customer feedback and reviews, and revenue.

Best,

Matthew D. Hardin

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Email: MatthewDHardin@protonmail.com

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On Dec 22, 2025, at 1:03 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

I have another witness disclosure to make:

Name: Suzette Colette Cole
Phone: 775-246-9901
Email: contact@bunnyranch.com
Address: 69 Monoliet Rd, Carson City, NV 89706

Scope of knowledge: Russell Greer’s public and/or written statements as to Kiera Keeper and restraining order(s) for conduct against Ms. Keeper. Russell Greer’s past vexatious litigation and whether documents purporting to be signed by Dennis Hof and/or Ms. Cole were forged. Russell Greer’s representations regarding his financial abilities to pay for prostitution. Whether or not particular writings by Mr. Greer and commentaries hosted on *KindEbooks*, *Google Drive*, or other websites are a Fair Use commentary on Mr. Greer’s work and/or behavior.

commentaries hosted on www.fairuse.com/, Google Drive, or other websites are a Fair Use commentary on Mr. Greer's work and/or behavior.

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On Dec 20, 2025, at 4:57 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon,

In light of your continued refusal to provide the documents relating to Roger Baylocq which you previously indicated were highly relevant and which you would be happy to provide upon request, in an abundance of caution I disclose as follows:

Name: Roger Baylocq

Phone: 775-623-3635

Email: ScottShadyCourt@gmail.com

Address: 400 W 1st St, Winnemucca, NV 89445

Scope of knowledge: Russell Greer's search for real estate in or near Winnemucca and financial resources required to purchase land in that vicinity. Russell Greer's stated financial abilities & business plans. Russell Greer's representations regarding his financial abilities to governmental officials. Content of documents referred to by Russell Greer in pleadings before the Las Vegas Justice Court.

Best,

Matthew D. Hardin

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Email: MatthewDHardin@protonmail.com

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On Dec 18, 2025, at 5:36 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good evening, Mr. Greer.

I'm writing to again request your emails with Roger Baylocq. You told the Nevada Court of Appeals (under penalty of perjury) that you would be happy to provide them "upon request." I've requested them. But much like the restraining order from Utah you said you would be happy to provide before being sanctioned and changing your tune, we're still waiting on it.

Please comply with my request.

Matthew D. Hardin

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On Dec 17, 2025, at 9:17 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

On page 14 of your (denied, attached) application for a restraining order against me, you said copies of your correspondence with Roger Baylocq are available upon request. I hereby request that you provide me those copies, as you volunteered you would in a document filed under penalty of perjury with the Nevada court.

Best,

<Court Docs.pdf>

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

Emilia.Mattarova@protonmail.com

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From: **Matthew D. Hardin** matthewdhardin@gmail.com
Subject: Re: PRESERVATION DEMAND
Date: January 2, 2026 at 10:45 PM
To: Russell Greer russmark@gmail.com

Good evening, Mr. Greer,

I still haven't heard from you. This inquiry dates back to December 13 of last year.

Best,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
Email: MatthewDHardin@protonmail.com

On Wed, Dec 31, 2025 at 8:17 AM Matthew Hardin <matthewdhardin@gmail.com> wrote:
Good morning,

I'm still waiting on a response to the below inquiry from December 13. What say you?

Thanks,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
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On Dec 30, 2025, at 9:56 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

The inquiry is in the email chain below, where you have been ignoring it since December 13. As a courtesy I will also copy and paste it here:

From December 13:

Good morning,

While I wait to be served with the latest personal protective order, I have another question for you. I'm considering filing a motion to transfer this case back to Florida (where it was properly venued prior to the statement that Steve Taylor was eager to testify in Utah) or Ohio (where Natalie Banks, our new witness, could testify without extensive travel). Do you consent to or oppose a retransfer of this case?

Thanks,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

From December 19, when you claimed for the first time you had not seen my inquiry:

Good morning, Mr. Greer.

I haven't heard from you on the below meet and confer request. Do you consent to or oppose transfer of this case to Ohio?

Thanks,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

From December 23, when you claimed for the second time that you had not seen my inquiry:

The conferral request in our Utah case was sent December 13, 2025. In my email on that date (re-attached here, and also copied in the below chain), I asked what your position would be on retransfer of the Utah case to Florida, or transfer to Ohio, in light of the new witness in Ohio and

the fact that your only Utah-based witness, Steve Taylor, has now been revealed to have died. Our position is that keeping this case in Utah now that there are indisputably no Utah-based witnesses, and in fact there is a witness in Ohio, would be inefficient. Because this is not a discovery conferral, I do believe your position via email is sufficient. Please respond to my December 13, 2025 email, which I am also re-attaching here.

I know you struggle with reading emails, but I have now sent and re-sent you the same inquiry for over two weeks, and you still have not responded.

Best,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 30, 2025, at 9:46 AM, Russell Greer <russmark@gmail.com> wrote:

What was your inquiry?

Sent from my iPhone

On Dec 30, 2025, at 5:58 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer. I'm still waiting to hear from you on my inquiry from 17 days ago.

Best,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 29, 2025, at 11:11 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I'm still waiting on a response to my December 13, inquiry. What say you?

Best,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 26, 2025, at 1:29 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Hi Mr. Greer.

I hope you had a wonderful Christmas. I'm writing because you still have not responded to my December inquiry, below.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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On Dec 23, 2025, at 2:41 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer.

I still haven't heard from you on the below meet & confer request. I know you were busy filing a new lawsuit in Nevada today, but I do hope you won't let that distract from your existing caseload.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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On Dec 22, 2025, at 4:50 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer,

Despite your email of December 20 (attached as an image, because you responded to a different chain rather than this one) in which you indicated that you had responded to the below email from December 13, I see no indication that you have actually done so. Please forward any response you claim was previously sent regarding this meet and confer request, or alternatively please respond for the first time.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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<Screenshot 2025-12-22 at 4.50.08 PM.png>

On Dec 20, 2025, at 9:36 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I'm still waiting for an answer on my conferral request from Dec. 13, below. What is your response?

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

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Email: MatthewDHardin@protonmail.com

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On Dec 19, 2025, at 7:43 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I haven't heard from you on the below meet and confer request. Do you consent to or oppose transfer of this case to Ohio?

Thanks,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 13, 2025, at 8:00 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

While I wait to be served with the latest personal protective order, I have another question for you. I'm considering filing a motion to transfer this case back to Florida (where it was properly vented prior to the statement that Steve Taylor was eager to testify in Utah) or Ohio (where Natalie Banks, our new witness, could testify without extensive travel). Do you consent to or oppose a retransfer of this case?

Thanks,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On Dec 12, 2025, at 10:02 AM, Russell Greer <RussMark@gmail.com> wrote:

Mr. Hardin,

Your repeated extrajudicial emails contain false, stigmatizing, and defamatory accusations, demands made outside authorized discovery, and invasive commentary about my personal life wholly unrelated to any claim or defense. Discovery in this matter is stayed.

Your conduct has now escalated to the point that I am preparing to seek a **personal protective order** based on harassment, intimidation, and interference with my personal affairs outside legitimate litigation activity.

I deny your allegations, reject your legal characterizations regarding in forma pauperis status, and will not engage in further informal discovery or accusatory correspondence.

Sent from my iPhone

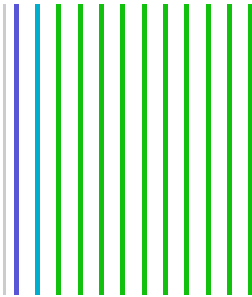
On Dec 12, 2025, at 6:46 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

Further to my email of December 8, 2025: I received proof yesterday evening from a Nevada sex worker who indicates that you were using Zelle and Venmo to send her "tips" during the time period that you were proceeding in forma pauperis in this case. Your social media from the relevant time period hinted that you were sending funds to women, but this is the first confirmation that we have received. These transfers would have taken place during a time you claimed to be too poor to pay your filings fees, and too poor to pay to obtain court records in Utah. Some of the transfers may have even taken place contemporaneously with your unsuccessful efforts to stay the Utah case to obtain counsel. But it appears you did not spend money on counsel, because you were instead paying these funds over to sex workers.

Please confirm not later than Monday, December 15, 2025 that you are preserving your financial records from Zelle and Venmo from the time period six months before your present lawsuit was instituted through the present. As we indicated in the December 8, 2025 email, our position is that these Zelle/Venmo records, especially when read together with your own previous filings in the U.S. District Court from 2018, will indicate that your allegations of poverty in this case are untrue and that dismissal is mandatory pursuant to 28 USC 1915 (e)(2), which expressly provides that the court must dismiss a lawsuit *even if the filing fee or a portion of it is later paid*.

I cannot presently subpoena these records because discovery is stayed, but I believe they will imminently be destroyed due to a 7 year retention period at Zelle and Venmo. If you refuse to provide immediate confirmation that these records are being preserved such that I can subpoena them when discovery reopens, I will have no choice but to seek a preservation order and other appropriate relief on Monday. Your failure to make such a confirmation may also lead to a request that the judge make an adverse inference with respect to any missing records.



Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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From: Russell Greer russmark@gmail.com
Subject: Re: PRESERVATION DEMAND
Date: January 3, 2026 at 10:43 PM
To: matthewdhardin@protonmail.com

Hi we can do a meet and confer on Tuesday at 12 pm PST.

Thanks

On Jan 2, 2026, at 7:45 PM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

Good evening, Mr. Greer,

I still haven't heard from you. This inquiry dates back to December 13 of last year.

Best,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
Email: MatthewDHardin@protonmail.com

On Wed, Dec 31, 2025 at 8:17 AM Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

I'm still waiting on a response to the below inquiry from December 13. What say you?

Thanks,

Matthew D. Hardin
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Direct Dial: 202-802-1948
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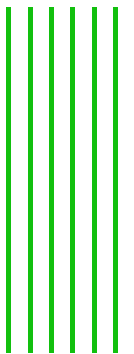
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Good morning, Mr. Greer.

The inquiry is in the email chain below, where you have been ignoring it since December 13. As a courtesy I will also copy and paste it here:

From December 13:



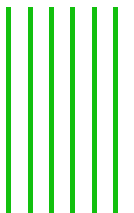
Good morning,

While I wait to be served with the latest personal protective order, I have another question for you. I'm considering filing a motion to transfer this case back to Florida (where it was properly venued prior to the statement that Steve Taylor was eager to testify in Utah) or Ohio (where Natalie Banks, our new witness, could testify without extensive travel). Do you consent to or oppose a retransfer of this case?

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The conferral request in our Utah case was sent December 13, 2025. In my email on that date (re-attached here, and also copied in the below chain), I asked what your position would be on retransfer of the Utah case to Florida, or transfer to Ohio, in light of the new witness in Ohio and the fact that your only Utah-based witness, Steve Taylor, has now been revealed to have died. Our position is that keeping this case in Utah now that there are indisputably no Utah-based witnesses, and in fact there is a witness in Ohio, would be inefficient. Because this is not a discovery conferral, I do believe your position via email is sufficient. Please respond to my December 13, 2025 email, which I am also re-attaching here.

I know you struggle with reading emails, but I have now sent and re-sent you the same inquiry for over two weeks, and you still have not responded.

Best,

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I hope you had a wonderful Christmas. I'm writing because you still have not responded to my December inquiry, below.

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Matthew D. Hardin

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Email: MatthewDHardin@protonmail.com

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On Dec 22, 2025, at 4:50 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon, Mr. Greer,

Despite your email of December 20 (attached as an image, because you responded to a different chain rather than this one) in which you indicated that you had responded to the below email from December 13, I see no indication that you have actually done so. Please forward any response you claim was previously sent regarding this meet and confer request, or alternatively please respond for the first time.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

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.

<Screenshot 2025-12-22 at 4.50.08 PM.png>

On Dec 20, 2025, at 9:36 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I'm still waiting for an answer on my conferral request from Dec. 13, below. What is your response?

Best,

Matthew D. Hardin

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On Dec 19, 2025, at 7:43 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

I haven't heard from you on the below meet and confer request. Do you consent to or oppose transfer of this case to Ohio?

Thanks,

Matthew D. Hardin

Hardin Law Office

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NYC Office: 212-680-4938

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On Dec 13, 2025, at 8:00 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

While I wait to be served with the latest personal protective order, I have another question for you. I'm considering filing a motion to transfer this case back to Florida (where it was properly vented prior to the statement that Steve Taylor was eager to testify in Utah) or Ohio (where Natalie Banks, our new witness, could testify without extensive travel). Do you consent to or oppose a retransfer of this case?

Thanks,

Matthew D. Hardin

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On Dec 12, 2025, at 10:02 AM, Russell Greer <RussMark@gmail.com> wrote:

Mr. Hardin,

Your repeated extrajudicial emails contain false, stigmatizing, and defamatory accusations, demands made outside authorized discovery, and invasive commentary about my personal life wholly unrelated to any claim or defense. Discovery in this matter is stayed.

Your conduct has now escalated to the point that I am preparing to seek a **personal protective order** based on harassment, intimidation, and interference with my personal affairs outside legitimate litigation activity.

I deny your allegations, reject your legal characterizations regarding in forma pauperis status, and will not engage in further informal discovery or accusatory correspondence.

Sent from my iPhone

On Dec 12, 2025, at 6:46 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer.

Further to my email of December 8, 2025: I received proof yesterday evening from a Nevada sex worker who indicates that you were using Zelle and Venmo to send her "tips" during the time period that you were proceeding in forma pauperis in this case. Your social media from the relevant time period hinted that you were sending funds to women, but this is the first confirmation that we have received. These transfers would have taken place during a time you claimed to be too poor to pay your filings fees, and too poor to pay to obtain court records in Utah. Some of the transfers may have even taken place contemporaneously with your unsuccessful efforts to stay the Utah case to obtain counsel. But it appears you did not spend money on counsel, because you were instead paying these funds over to sex workers.

Please confirm not later than Monday, December 15, 2025 that you are preserving your financial records from Zelle and Venmo from the time period six months before your present lawsuit was instituted through the present. As we indicated in the December 8, 2025 email, our position is that these Zelle/Venmo records, especially when read

indicated in the December 6, 2025 email, but position is that these Zelle/Venmo records, especially when read together with your own previous filings in the U.S. District Court from 2018, will indicate that your allegations of poverty in this case are untrue and that dismissal is mandatory pursuant to 28 USC 1915 (e)(2), which expressly provides that the court must dismiss a lawsuit *even if the filing fee or a portion of it is later paid*.

I cannot presently subpoena these records because discovery is stayed, but I believe they will imminently be destroyed due to a 7 year retention period at Zelle and Venmo. If you refuse to provide immediate confirmation that these records are being preserved such that I can subpoena them when discovery reopens, I will have no choice but to seek a preservation order and other appropriate relief on Monday. Your failure to make such a confirmation may also lead to a request that the judge make an adverse inference with respect to any missing records.

Best,

Matthew D. Hardin

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