

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ILLOOMINATE MEDIA, INC ET AL

Plaintiffs

v.

CAIR FLORIDA, INC., et al

Defendants.

Case Number: 9:19-cv-81179

PLAINTIFFS' INTERIM RESPONSE TO OBJECTION TO CERTIFICATION/NOTICE

Plaintiffs will be submitting a full response to Defendants' so-called Objection to Certification/Notice (the "Objection"), which Plaintiffs construe as a motion and thus Plaintiffs will file a timely response. Ms. Laura Loomer, on behalf of herself and Illoominate Media, attempted to comply with this Court's order of May 3, 2023 in good faith and the uncalled for *ad hominem* attacks on her and undersigned counsel set forth in the so called Objection filed by CAIR Florida, Inc. et. al. will be proven to be sanctionable.

In this regard, Ms. Loomer and Illoominate have put Defendants on notice that they will be moving for sanctions if his matter is not resolved and a meet and confer prior to filing the motion for sanctions was proposed for this Tuesday at 9 am to attempt to resolve matters. Counsel for Ms. Loomer and Illoominate Media Inc had been engaged in settlement discussions with counsel for Defendants and this so called Objection, which is in reality a motion, was filed for tactical reasons by counsel, rather than and on the merits to pressure Ms. Loomer and Illoominate into a settlement of the Defendants' choosing.

It is hoped that this matter can be worked out to avoid further litigation, and to avoid having to move for sanctions.

Dated: May 19, 2023

Respectfully Submitted,

/s/ Larry Klayman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 19, 2023 a true copy of the foregoing was filed via ECF and served to all counsel of record through the Court's ECF system.

/s/ Larry Klayman