

**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

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Case Number: 9:19-CV-81179

**PLAINTIFFS' RESPONSE TO ORDER OF MAGISTRATE JUDGE BRUCE E.
REINHART OF MAY 22, 2023**

Plaintiffs, Laura Loomer and Illoominate Media, LLC, through the undersigned counsel, hereby respond to the above-styled order of May 22, 2023, by advising the Court that at the time that the subject certification was filed by an associate lawyer of the undersigned counsel, as Mr. Larry Klayman was then on travel out of state, it was, in good faith, believed to be accurate and complete, based on the representations of Ms. Loomer for the Plaintiffs and Mr. Asher Anderson, the executive assistant and paralegal to Mr. Klayman of the Klayman Law Group, P.A. The attached and sworn affidavits of Ms. Loomer, on behalf of herself and Illoominate Media, LLC, which is an LLC rather than an ordinary corporation contrary to what her prior counsel listed on the caption of the operative complaints filed in this case, set forth the underlying facts of the disclosure and production of the required information and documentation to counsel for Defendants.

Ms. Loomer and Illoominate Media, LLC, have taken timely concrete action to obtain the funds from prior counsel, whose representation was at best negligent, to pay in full the attorneys fees and costs award and have at all times acted in good faith and in the interim has offered to set up a payment plan with Defendants, which can be debited and offset later when the funds are expected in due course to be paid by prior counsel to her and Illoominate Media, LLC.

Date: June 1, 2023

Respectfully submitted,

s/ Larry Klayman

Larry Klayman, Esq.

Florida Bar No.: 246220

Klayman Law Group P.A.

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Boca Raton, FL, 33433

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*Counsel for Laura Loomer
and Illoominate Media, LLC.*

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SWORN AFFIDAVIT OF LAURA LOOMER


I, Laura Loomer, being over eighteen years of age, hereby swear to the best of my personal knowledge and belief as follows:

1. I am a plaintiff in this lawsuit in addition to my LLC, Illoominate Media, LLC.
2. I was directed by my counsel Larry Klayman, Esq., of the Klayman Law Group, P.A. and his executive assistant and paralegal, Asher Anderson, pursuant to this Court’s order of May 3, 2023, to fill out and complete Fact Information Sheets for myself and Illoominate Media, LLC. Contrary to what is set forth in the caption of this case, Illoominate Media, LLC is not an Inc. and not an ordinary corporation. That error was made by my former counsel Ron Coleman, who negligently at best represented me and Illoominate Media, LLC in this case, and then abandoned us before the attorneys fees and costs award was issued.
3. In this regard, I worked diligently with Mr. Anderson to accurately fill out the Fact Sheets for both myself and Illoominate Media, LLC to provide the information and

requested documentation to the Defendants' counsel. Not realizing that there was a different Fact Sheet form for corporations, and because Illoominate Media, LLC is an LLC and not an ordinary corporation, we used the Fact Sheet for me personally and simply notated that it was for Illoominate Media, LLC. Mr. Anderson and I assured Mr. Klayman on several occasions that everything that was required to be disclosed and produced was produced, as he was away on travel out of state and needed to have filed by his associate lawyer a certification by 5:00 PM ET on May 15, 2023.

4. I later came to understand that the corporate Fact Sheet required that business bank account statements spanning over the past 3 years and an additional tax return arguably needed to be produced in addition to what I already produced, and thus I provided in good faith additional business bank account statements for 2021, 2022, and 2023 to date, as well as an additional tax return that represents tax year 2019 to the Defendants' counsel, even though it is not clear to me that an LLC should be treated as different than me personally.

Sworn to under penalty of perjury.

DocuSigned by:

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Laura Loomer
For Myself and Illoominate Media, LLC

Date: June 1, 2023

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SWORN AFFIDAVIT OF ASHER ANDERSON

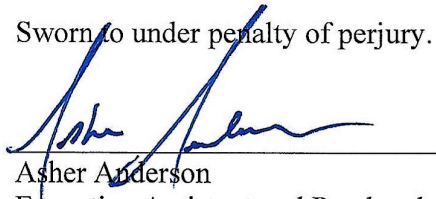
I, Asher Anderson, being over eighteen years of age, hereby swear to the best of my personal knowledge and belief as follows:

1. I am the executive assistant and paralegal to Larry Klayman, Esq. of the Klayman Law Group, P.A., counsel to Plaintiffs Laura Loomer and Illoominate Media, LLC.
2. Mr. Klayman, who was on travel and out of state, assigned me to work with the Ms. Loomer to comply to the Court’s order of May 3, 2023, and I was the person who carefully assisted Ms. Loomer with completing the financial forms for her and her Illoominate Media, LLC. That Illoominate Media is listed on the caption of this case as an Inc., was an error made by her prior counsel, Ronald Coleman, who I understand committed a number of errors in his representation of Plaintiffs.
3. In filling out the Fact Information Sheets, it is my understanding, as also attested to by Ms. Loomer and Illoominate Media, LLC, that she provided all of the required

information and supporting documents, in terms of what existed on the date of the disclosure and production. Ms. Loomer and I did not however realize that the Fact Information Sheet for Illoominate Media, LLC was arguably different than for her personally, so we submitted the same form for both Plaintiffs with the requested documents, by listing Illoominate Media, LLC on the Fact Information Sheet. We later learned after we submitted the Illoominate Media, LLC Fact Information Sheet for both Ms. Loomer and Illoominate Media, LLC, that some additional documents arguably needed to be produced for Illoominate Media, LLC, namely bank statements that date back 3 years, 2021, 2022 and 2023 to date, and an additional tax return for 2019, and we provided this, in good faith, to counsel for the Defendants.

4. At the time that we prepared both forms Mr. Klayman was on travel and out of state on various matters and Ms. Loomer and I assured him on more than one occasion that all that was required to be provided and produced was provided and produced to the Defendants' counsel, and that the information provided on the forms was completely accurate. He therefore had filed, by his associate lawyer, the certification based on these representations.
5. To the best of my personal knowledge and belief, Ms. Loomer and Illoominate Media LLC have fully complied with the Court's order of May 3, 2023.

Sworn to under penalty of perjury.

A handwritten signature in blue ink, appearing to read "Asher Anderson", is written over a horizontal line.

Asher Anderson
Executive Assistant and Paralegal
Klayman Law Group, P.A.

Date: June 1, 2023