

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TIMOTHY KING, *et.al.*,
Plaintiffs,

**Case No. 20-cv-13134
Hon. Linda V. Parker**

v

GRETCHEN WHITMER, in her official capacity as
Governor State of Michigan, *et.al.*,
Defendants,

and

**ROBERT DAVIS,
CITY OF DETROIT,
DEMOCRATIC NATIONAL COMMITTEE,
MICHIGAN DEMOCRATIC PARTY,**
Intervenor-Defendants.

ANDREW A. PATERSON (P18690)
Attorney for Intervenor-Defendant R. Davis
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**INTERVENOR DEFENDANT ROBERT DAVIS' MOTION
FOR ORDER TO SHOW CAUSE WHY ATTORNEY LIN WOOD
SHOULD NOT BE HELD IN CRIMINAL CONTEMPT FOR
VIOLATING LR 83.32(d)(3),(e)(2)**

NOW COMES, INTERVENOR DEFENDANT ROBERT DAVIS

(hereinafter "Intervenor Defendant Davis"), by and through his

attorney, ANDREW A. PATERSON, and for his Motion for Order to Show Cause Why Attorney Lin Wood Should Not Be Held In Criminal Contempt for Violating LR 83.32(d)(3),(e)(2), states the following:

On July 12, 2021, the Court held an extensive 6-hour long hearing on Defendants' and Intervening Defendants' respective motions for sanctions against the Plaintiffs and Plaintiffs' counsel. During the 6-hour hearing, Plaintiffs' counsel Lin Wood was repeatedly disrespectful to the Court and was defiant to the Court's directives given during the hearing. Surprising, Mr. Wood's total disrespect of the Court's orders and directives continued after the conclusion of yesterday's hearing.

According to published media reports—MSNBC and Law and Crime—“[w]ithin hours of the close of those proceedings, Lin Wood posted a video snippet on his more than 840,000-follower Telegram account, featuring Sidney Powell's closing monologue.” See <https://www.msn.com/en-us/news/crime/immediately-after-kraken-sanctions-hearing-lin-wood-posted-a-video-snippet-of-zoom-court-the->

[judge-absolutely-prohibited-any-recordings/ar-](https://www.msn.com/en-us/news/crime/immediately-after-kraken-sanctions-hearing-lin-wood-posted-a-video-snippet-of-zoom-court-the-judge-absolutely-prohibited-any-recordings/ar-AAAM4asz?ocid=mailsignout&li=BBnbfcL)

[AAM4asz?ocid=mailsignout&li=BBnbfcL](https://www.msn.com/en-us/news/crime/immediately-after-kraken-sanctions-hearing-lin-wood-posted-a-video-snippet-of-zoom-court-the-judge-absolutely-prohibited-any-recordings/ar-AAAM4asz?ocid=mailsignout&li=BBnbfcL).¹

Mr. Wood's rebroadcast of a portion of the Court's July 12, 2021 is in direct violation of Local Rule 83.32 (e)(2) for the Eastern District of Michigan, which explicitly states:

“Taking photographs or video recordings in connection with any Judicial Proceeding (including any participants in a Judicial Proceeding while they are in a courtroom or its environs), **and the recording or broadcasting of Judicial Proceedings by radio or television or other means is prohibited.**” (emphasis supplied).

Additionally, Local Rule 83.32(d)(3) further provides that “[t]aking **photographs, and making video or audio recordings of any type are strictly prohibited.**” (emphasis supplied).

Mr. Wood's blatantly disregard of the local rules of the Eastern District of Michigan and his continued blatant disrespect of this Court shall not go unpunished. Local Rule 83.32(g) provides various

¹ July 12, 2021 online article entitled: Immediately After 'Kraken' Sanctions Hearing, Lin Wood Posted a Video Snippet of Zoom Court. The Judge 'Absolutely Prohibited' Any Recordings.” (**Attached as Exhibit A**). See <https://www.msn.com/en-us/news/crime/immediately-after-kraken-sanctions-hearing-lin-wood-posted-a-video-snippet-of-zoom-court-the-judge-absolutely-prohibited-any-recordings/ar-AAAM4asz?ocid=mailsignout&li=BBnbfcL>

punishments and sanctions the Court may impose, which includes disbarment and a finding of criminal contempt. LR 83.32(g)(1),(3). Local Rule 83.32(g)(3) provides, in relevant part, that “[a] violation of this rule may be punished as criminal contempt of court.” Intervenor Defendant Robert Davis’ believes that Mr. Wood’s actions of deliberately defying the local rules of this district warrants criminal contempt proceedings.

CONCLUSION

WHEREFORE, for the foregoing reasons and for the reasons that will be set forth in a separate brief in support, Intervening Defendant Robert Davis prays that this Honorable Court enters an order requiring Plaintiffs’ attorney Lin Wood to show cause why he should not be held in criminal contempt for violating Local Rule 83.32(d)(3), (e)(2).

Dated: July 13, 2021

Respectfully submitted,

/s/ANDREW A. PATERSON
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CERTIFICATE OF SERVICE

I, ANDREW A. PATERSON, certify that the foregoing document(s) was filed and served via the Court's electronic case filing and noticing system (ECF) this 13th day of July, 2021, which will automatically send notification of such filing to all attorneys and parties of record registered electronically.

Dated: July 13, 2021

Respectfully submitted,

/s/ ANDREW A. PATERSON
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