

Russell Greer
1100 Dumont Blvd
Apt 139
Las Vegas, NV 89169
801-895-3501
russmark@gmail.com
Pro Se Litigant

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

**PLAINTIFF'S SUPPLEMENTAL NOTICE
IN SUPPORT OF MOTION TO
DISQUALIFY
MATTHEW D. HARDIN**

Case No.: 2:24-cv-00421-DBB-JCB

Plaintiff Russell G. Greer respectfully submits this Supplemental Notice in support of his pending Motion to Disqualify Defense Counsel Matthew D. Hardin and to revoke his pro hac vice admission.

This supplement concerns *new* misconduct that occurred **after** the filing of the Motion, which further demonstrates Hardin's pattern of intimidation, improper third-party contact, and coercive tactics.

I. NEW INCIDENT OF IMPROPER THIRD-PARTY CONTACT AND INTIMIDATION

On December 8, 2025, Mr. Hardin sent Plaintiff an unsolicited email and again **CC'd an uninvolved private citizen, Mr. Waylon Huber**, despite having no legitimate reason to involve him in this litigation.

This is especially concerning because Plaintiff referenced Mr. Huber in prior filings **only to show that Mr. Hardin had previously contacted Mr. Huber during the Winnemucca public-records matter**, even though Mr. Huber had absolutely no connection to that issue. Plaintiff never offered Mr. Huber as a witness and never suggested he had relevant knowledge.

In response to being CC'd by Hardin, **Mr. Huber immediately wrote:**

"Russle you know that I have nothing to do with any of this. Please leave me out of it."

This statement makes clear that:

1. **Mr. Huber has no involvement in this case;**
2. **Mr. Huber does not want to be contacted or dragged into this matter;**
3. **Hardin's conduct is causing real harm and distress to uninvolved third parties.**

Despite this, Mr. Hardin threatened that if Plaintiff “continues to bring him up,” Hardin “may need to name him as a witness.” This is a **coercive tactic** that serves no legitimate litigation purpose.

II. WHY THIS CONDUCT IS ETHICALLY IMPROPER

1. Coercive Threat Using Witness Designation

Threatening to designate an uninvolved private citizen as a witness solely because Plaintiff filed motions violates:

- **ABA/Utah R. Prof. Conduct 4.4** – cannot use means with no substantial purpose other than to burden a third person;
- **ABA/Rule 8.4(d)** – conduct prejudicial to the administration of justice;
- **ABA/Rules 3.1 & 3.4** – abuse of legal process and improper witness leverage.

2. Repeated Improper Contact With Plaintiff’s Acquaintances

This incident is not isolated.

Hardin previously contacted Mr. Huber during the Winnemucca issue, and now repeats the misconduct by CC’ing him again.

This demonstrates a pattern of:

- unwanted contact,
- harassment of uninvolved individuals,
- and attempts to inflict real-world reputational harm outside the litigation.

3. Attempt to Chill Plaintiff’s Access to the Courts

Hardin explicitly tied his threat to Plaintiff’s filing activity:

“The more you do that...”

This constitutes coercion and direct interference with Plaintiff’s right to petition the Court.

III. THIS NEW EVIDENCE SUPPORTS DISQUALIFICATION

This new incident independently meets the standard for disqualification under:

- *Weeks v. Independent School Dist. No. 1-89* (serious ethical concerns),
- *Hempstead Video, Inc. v. Village of Valley Stream* (conduct likely to taint proceedings),
- *DUCivR 83-1.1* (revocation of pro hac vice status for good cause).

Hardin's escalating misconduct, including threats, intimidation, and misuse of witness-related procedures, poses a direct threat to the fairness and integrity of these proceedings.

IV. REQUEST

Plaintiff respectfully requests that the Court:

1. Take judicial notice
2. Consider this additional misconduct as further grounds supporting the Motion to Disqualify; and
3. Revoke Mr. Hardin's pro hac vice admission and disqualify him from further participation in this action.

Respectfully submitted,

Russell Greer
/rgreer/
12-09-25

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on 12-9-25, I served a true and correct copy of the attached document by ECF to all attorneys on record.

EXHIBIT A

Russle you know that I have nothing to do with any of this. Please leave me out of it.

Get [Outlook for iOS](#)

From: Matthew Hardin <matthewdhardin@gmail.com>

Sent: Saturday, December 6, 2025 9:27:18 AM

To: Russell Greer <russmark@gmail.com>

Cc: Waylon Huber <waylon@robinhoodrealtynv.com>

Subject: Re: Activity in Case 2:24-cv-00421-DBB-JCB Greer v. Moon et al Reply Memorandum/
Reply to Response to Motion

Mr. Greer:

I have not yet named Waylon Huber as a witness in this case. As you continue to bring him up in filings, however, you are creating a situation where I may need to name him to defend against the accusations you keep making. I am not telling you what to do, you can obviously make your own decisions as to whether you want to keep mentioning Mr. Huber in your filings. But the more you do that, the more likely it becomes that I will have to name him as a witness.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: [202-802-1948](tel:202-802-1948)

NYC Office: [212-680-4938](tel: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.

On Dec 5, 2025, at 6:21PM, utd_enotice@utd.uscourts.gov wrote:

This is an automatic e-mail message generated by the CM/ECF system. If you need assistance, call the Help Desk at [\(801\)524-6100](tel:8015246100).

*****NOTE TO PUBLIC ACCESS USERS*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including unrepresented parties) who receive notice by email to receive one free**

electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. Access to the one free electronic copy expires as designated by PACER. To avoid incurring charges later, download and save a copy of the document during the first access. However, if the referenced document is a transcript, the free download restrictions and 30-page limit do not apply.

*****NOTICE REGARDING MAILING COPIES OF NEFS AND DOCUMENTS***** The court will mail a copy of the NEF and associated document of court-generated documents (e.g., reports and recommendations, orders, and notices of hearings) to parties who are not registered to receive electronic notice, as indicated under "Notice has been delivered by other means to. . . ". The court will not mail NEFs and documents of party-generated filings to any party (including the filing party) even if the "Notice has been delivered by other means to. . . " states otherwise. The filing party is responsible for serving a copy of the NEF or document on parties who do not receive electronic notice.

US District Court Electronic Case Filing System

District of Utah

Notice of Electronic Filing

The following transaction was entered on 12/5/2025 at 4:21 PM MST and filed on 12/5/2025

Case Name: Greer v. Moon et al
Case Number: [2:24-cv-00421-DBB-JCB](#)
Filer: Russell G. Greer
Document Number: [396](#)

Docket Text:

REPLY to Response to Motion re [394] MOTION for Protective Order and Memorandum in Support filed by Plaintiff Russell G. Greer. (alf)

2:24-cv-00421-DBB-JCB Notice has been electronically mailed to:

Stewart B. Harman stewart.harman@bachhomes.com,
aanderson@pckutah.com

Matthew D. Hardin matthewdhardin@gmail.com,
matthewdhardin@ecf.courtdrive.com, matthewdhardin@protonmail.com

Russell G. Greer russmark@gmail.com

2:24-cv-00421-DBB-JCB Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=[1060034973](#) [Date=[12/5/2025](#)] [FileNumber=[6355268-](#)

[0](#)

]

[3fec54195c889fb22a2755bcc313873e443a601378c4d5fd69a1c8d1805231341

02

48074c011d175d662973ee391b01aad141a54642c00b9d11b8f9a1a00eb4d]]

EXHIBIT B

