

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, v. JOSHUA MOON, <i>et al.</i> Defendants.</p>	<p>DEFENDANTS’ NOTICE OF SUPPLEMENTAL AUTHORITY REGARDING MOTION AT ECF NO. 330</p> <p>Case No. 2:24-cv-00421-DBB</p> <p>District Judge David Barlow Magistrate Judge Jared C. Bennett</p>
--	---

NOW COME Defendants Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and file this Notice of Supplemental Authority relating to the Motion for Sanctions at ECF No. 330. Specifically, Defendants state as follows:

1. Defendants sought sanctions on June 5, 2025, arguing that Mr. Greer engaged in a flagrant violation of this Court’s stay on discovery. ECF No. 330. In opposition, Mr. Greer said either that he didn’t violate the stay, or that he somehow sincerely believed his behavior was justified even if he was wrong. ECF No. 334.

2. In parallel litigation Mr. Greer later filed, Mr. Greer later told the Las Vegas Justice Court, under penalty of perjury, that he violated this Court’s discovery stay. ECF No. 421-1 at 11. (“During the same period in which discovery was stayed, I attempted to pursue formal discovery through subpoenas to two John Doe defendants.”). Thus there

is no longer any serious question of whether Mr. Greer acted willfully or with knowledge that he was violating this Court's discovery stay, as Defendants alleged at ECF No. 330. Mr. Greer has now admitted it, in his own words, voluntarily and under penalty of perjury.

3. On December 23, 2025, Mr. Greer filed a new lawsuit in Nevada. In that lawsuit, Mr. Greer told the U.S. District Court that he 'has training and experience as a paralegal and is therefore familiar with legal research, drafting, and procedure.' ECF No. 426-1 at 11. Mr. Greer added that as a result of this training and knowledge, he is "fully capable of representing himself." *Id.* Defendants respectfully submit that Mr. Greer's self-professed knowledge of the law and of proper procedure when dealing with the U.S. District Court in Nevada undermines Mr. Greer's purported "sincere belief" defense in this Court. It also shows that Mr. Greer's legal violations here were willful in nature, and makes sanctions more appropriate.

DATED December 23, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants

Joshua Moon and Lolcow, LLC