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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

<p>RUSSELL GREER, Plaintiff, v. JOSHUA MOON, <i>et al.</i> Defendants.</p>	<p>DEFENDANTS' MOTION FOR AN EXTENSION OF TIME AND STAY OF ALL FUTURE MOTIONS</p> <p>Case No. 2:24-cv-00421-DBB</p> <p>District Judge David Barlow Magistrate Judge Jared C. Bennett</p>
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NOW COME Defendants, Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and file this Motion for an Extension of Time to respond to Mr. Greer's Motion at ECF No. 433, and Motion to Stay all future motions filed by Mr. Greer. In support of this Motion, Defendants state as follows:

1. Mr. Greer continues to file repetitive motions, both in this court and even in state court, seeking effectively the same relief. See, e.g., ECF Nos. 433, 423, 411 (seeking to strike defense witness disclosures and, more recently, also to bar the defense from taking any action at all to investigate the claims or defenses at issue in this case), 424, 400 (seeking, in relevant part, sanctions against undersigned counsel or to disqualify undersigned counsel for the same basic reasons set forth in Mr. Greer's repeated motions to strike), 421-1 (seeking a personal protective order against defense counsel to prevent the investigation of claims at issue in this case).

2. Mr. Greer's repetitive motions practice swells this Court's docket and unreasonably burdens the defense and the Court itself. Even without any new motions, there is already a tremendous backlog of fully briefed motions pending in this case which have not yet been adjudicated. See, e.g., ECF Nos. 274, 299, 313, 314, 330, 346, 350, 385, 394, 400, 402, 412, 417, 424.

3. Defendants respectfully submit that it is in the interest of judicial economy to defer briefing on Mr. Greer's latest "Motion to Strike," ECF No. 433, at a minimum, until the Court has had the opportunity to rule on Mr. Greer's three prior motions for substantively identical relief. ECF Nos. 406, 411, 423, 433. For that reason, Defendants request an extension of time to respond to the motion at ECF No. 433 and that their response to that motion be due 14 days after the Court has ruled on Mr. Greer's three prior motions to strike.

4. Defendants further respectfully submit that it is in the interest of judicial economy for this Court to stay briefing on any future motions Mr. Greer might file, pending a ruling on the motions which are already pending, including but not limited to the dispositive motion at ECF No. 274 and the potentially dispositive issue of whether Mr. Greer has shown adequate cause for his repeated failure to comply with this Court's order granting a motion to compel. ECF Nos. 381, 369-1.¹

WHEREFORE, for the reasons set forth herein, Defendants respectfully submit that the time has come for this Court to staunch the bleeding on its docket and prevent

¹ As of this filing, Mr. Greer has still failed to bring himself into compliance with this Court's order granting a motion to compel at ECF No. 227, despite the passage of time and despite repeated orders from this Court to do so.

Mr. Greer's further efforts to "pile on" additional motions to a docket that is already extraordinary in terms of its volume of unadjudicated motions.

DATED January 6, 2026.

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants

Joshua Moon and Lolcow, LLC