

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

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

**NOTICE OF PLAINTIFF'S
ENCOURAGEMENT OF
VIOLATION OF SUBPOENAS**

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

District Judge David Barlow
Magistrate Judge Jared C. Bennett

NOW COME the Defendants, by and through undersigned counsel, and hereby give NOTICE that the Plaintiff appears to be taking active steps to encourage the recipients of lawful subpoenas in this matter to fail to cooperate with the legal process.

As indicated in attached Exhibit A, through diligent steps, undersigned counsel was able to coordinate with Nathan Greer to schedule a deposition and to accept service of a subpoena for that deposition via email on December 18, 2024. As indicated in the attached Exhibit B, undersigned counsel scheduled a deposition with Scott Greer and arranged with him to accept service of a subpoena via email mere hours ago on December 19, 2024. Both Subpoenas and Notice of Deposition were simultaneously served upon the Plaintiff Russell Greer.

Plaintiff Russell Greer, who has to date refused to indicate what the subjects of either Nathan Greer's or Scott Greer's knowledge and expected testimony are, immediately demanded that undersigned counsel provide a full list of questions which

would be posed in the depositions. Exhibit C. Upon undersigned counsel's refusal to provide Mr. Greer advanced foreknowledge of Defendants' entire deposition strategy, Russell Greer wrote to both Nathan Greer and Scott Greer to encourage them to refuse to cooperate with the deposition process. Exhibits D and E.

Undersigned counsel has had nothing but cordial and professional interactions with both of the subpoenaed witnesses. Undersigned counsel does not presently anticipate that the witnesses will refuse to cooperate based upon Plaintiff Russell Greer's demands or his scurrilous accusations against undersigned counsel. Nevertheless, to the extent that this behavior is further evidence of Russell Greer's absolute and continued refusal to allow the discovery process to play out in this case, and Russell Greer's continued escalation of the costs of the defense, this Court should be made aware.

DATED December 19, 2024


HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants



From: Matthew Hardin matthewdhardin@gmail.com 
Subject: Subpoena in Greer v. Moon et al.
Date: December 18, 2024 at 6:00 PM
To: kngreer@gmail.com
Cc: Russell Greer russmark@gmail.com
Bcc: Joshua Moon jcmoon@pm.me

Dear Mr. (Nathan) Greer:

Thank you for your telephone call and cooperation in scheduling this deposition. As we discussed, please see attached a Subpoena and Notice of Deposition. As indicated in the accompanying letter, a check has been mailed to your attention in the amount of 43.83.

Merry Christmas,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

NathanGreerSubpoenaPackage
.pdf
538 KB



MATTHEW D. HARDIN

101 Rainbow Drive · Box # 11506 · Livingston, TX 77399
Phone: (202) 802-1948 · Facsimile: (212) 433-8368
Email: MatthewDHardin@protonmail.com

December 18, 2024

Nathan Greer

REDACTED

Round Rock, TX 78665

Re: *Greer v. Moon et al.* (D. Utah Case No. 2:24-cv-00421)
NOTICE OF DEPOSITION & SUBPOENA

Dear Mr. Greer:

Please find enclosed a Notice of Deposition and Subpoena. You are required to appear for a deposition in the above-referenced case at 9:00 a.m. on January 30, 2024. As indicated in the Notice of Deposition and in the Subpoena, the deposition will be held at

Round Rock Multipurpose Complex
2001 N. Kenney Fort Blvd
Round Rock, TX 78665

This location appears to be approximately 3 miles from your home in Round Rock (6 miles round trip). I have therefore arranged for a check to be mailed to your attention (under separate cover) in the amount of \$43.93, which is the appearance fee for one day of testimony at \$40, plus \$3.93 in allowable mileage costs.

Please feel free to call or email with any questions or concerns.

Regards,



Matthew D. Hardin

UNITED STATES DISTRICT COURT

for the

District of Utah

Russell Greer

Plaintiff

v.

Joshua Moon, et al.

Defendant

Civil Action No. 2:24-cv-00421-DBB-JCB

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Nathan Greer

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Round Rock Multipurpose Complex
2001 N. Kenney Fort Blvd
Round Rock, TX 78665

Date and Time:

January 30, 2025 at 9 a.m.

The deposition will be recorded by this method: Both audiovisually and stenographically.

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 12/18/2025

CLERK OF COURT

OR

/s/ Matthew D. Hardin

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Joshua Moon and Lolcow, LLC, who issues or requests this subpoena, are:

Matthew D. Hardin, 101 Rainbow Drive # 11506, Livingston TX 77399 / MatthewDHardin@gmail.com / 202-802-1948

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Pursuant to a telephone conversation on Dec. 18, 2024, Nathan Greer indicated he would accept this subpoena via email.

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

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

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

NOTICE OF DEPOSITION

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

District Judge David Barlow
Magistrate Judge Jared C. Bennett

To: Russell Greer (Plaintiff)

From: Joshua Moon and Lolcow LLC (Defendants)

Pursuant to Fed. R. Civ. P. 30, NOTICE IS HEREBY GIVEN that Defendants will
take the deposition of:

Nathan Greer

REDACTED

Round Rock TX 78665

beginning at 9:00 a.m., on January 30, 2025, at

Round Rock Multipurpose Complex
2001 N. Kenney Fort Blvd
Round Rock, TX 78665

All testimony will be recorded via both audiovisual and stenographic means.

DATED December 18, 2024

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants

cc: Nathan Greer

From: Matthew D. Hardin MatthewDHardin@protonmail.com 
Subject: Subpoena / Notice of Deposition
Date: December 19, 2024 at 1:35 PM
To: greer.scott@gmail.com
Cc: Russell Greer russmark@gmail.com
Bcc: Joshua Moon jcmoon@pm.me



ScottGreerSubpoenaPackage.pdf
531 KB



Good morning, Mr. (Scott) Greer.

Thank you for your call this morning. As we discussed, please see attached a subpoena to appear for a deposition via Zoom or similar technology on February 10, 2025. You will receive a check in payment of the \$40 appearance fee in the mail.

Merry Christmas,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

MATTHEW D. HARDIN

101 Rainbow Drive · Box # 11506 · Livingston, TX 77399
Phone: (202) 802-1948 · Facsimile: (212) 433-8368
Email: MatthewDHardin@protonmail.com

December 19, 2024

Scott Greer

REDACTED

Evanston, WY 82930

Re: *Greer v. Moon et al.* (D. Utah Case No. 2:24-cv-00421)
NOTICE OF DEPOSITION & SUBPOENA

Dear Mr. Greer:

Please find enclosed a Notice of Deposition and Subpoena. You are required to appear for a deposition in the above-referenced case at 9:00 a.m. on February 10, 2025. As indicated in the Notice of Deposition and in the Subpoena, the deposition will be held virtually, via audiovisual technology such as Zoom or similar software.

Under federal law, you are entitled to an appearance fee. I have therefore arranged for a check to be mailed to your attention (under separate cover) in the amount of \$40, which is the appearance fee for one day of testimony. Because this deposition is being held virtually, you are not entitled to travel costs.

Please feel free to call or email with any questions or concerns.

Regards,



Matthew D. Hardin

UNITED STATES DISTRICT COURT

for the

District of Utah

Russell Greer

Plaintiff

v.

Joshua Moon, et al.

Defendant

Civil Action No. 2:24-cv-00421-DBB-JCB

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

Scott Greer

To:

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: REDACTED Evanston, WY 82930 Deposition to be held Via Zoom or similar technology	Date and Time: Feb. 10, 2025, beginning at 9:00 a.m.
---	---

The deposition will be recorded by this method: Audiovisually and stenographically.

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 12/19/2024

CLERK OF COURT

OR

/s/ Matthew D. Hardin

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Joshua Moon and Lolcow, LLC, who issues or requests this subpoena, are:

Matthew D. Hardin, 101 Rainbow Drive # 11506, Livingston TX 77399 / MatthewDHardin@gmail.com / 202-802-1948

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Additional information regarding attempted service, etc.:
Pursuant to a telephone conversation on Dec. 19, 2024, Scott Greer indicated he would accept this subpoena via email.

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

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(i) disclosing a trade secret or other confidential research, development, or commercial information; or

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(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Matthew D. Hardin (pro hac vice)
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Livingston, TX 77399
Telephone: (202) 802-1948
Email: MatthewDHardin@gmail.com
Attorney for Defendants

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

NOTICE OF DEPOSITION

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

District Judge David Barlow
Magistrate Judge Jared C. Bennett

To: Russell Greer (Plaintiff)

From: Joshua Moon and Lolcow LLC (Defendants)

Pursuant to Fed. R. Civ. P. 30, NOTICE IS HEREBY GIVEN that Defendants will
take the deposition of:

Scott Greer

REDACTED

Evanston, WY 82930

beginning at 9:00 a.m., on February 10, 2025, at

207 Broken Circle Dr
Evanston, WY 82930

Via audio/visual technology, including but not limited to Zoom software.

All testimony will be recorded via both audiovisual and stenographic means.

DATED December 19, 2024

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants



From: Russell Greer russmark@gmail.com
Subject: Re: Subpoena in Greer v. Moon et al.
Date: December 19, 2024 at 3:17 PM
To: Matthew Hardin matthewdhardin@gmail.com
Cc: kngreer@gmail.com

Mr. Hardin.

Before you begin harassing my witnesses, aka my family, I am going to need to see a list of questions you intend to ask. Pronto. If the questions are irrelevant, I will be filing a motion to quash.

I provided the witnesses in good faith, not for them to be harassed. I was given no notice of your intent with this.

If I do not receive a list of questions you intend to ask by Monday the 23rd, I will be filing a motion to quash your predatory actions

Further, Nathan wishes to withdraw as a witness.

Sent from my iPhone

On Dec 18, 2024, at 3:00 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Dear Mr. (Nathan) Greer:

Thank you for your telephone call and cooperation in scheduling this deposition. As we discussed, please see attached a Subpoena and Notice of Deposition. As indicated in the accompanying letter, a check has been mailed to your attention in the amount of 43.83.

Merry Christmas,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

<NathanGreerSubpoenaPackage.pdf>

From: Russell Greer russmark@gmail.com
Subject: Re: Subpoena / Notice of Deposition
Date: December 19, 2024 at 3:20 PM
To: matthewdhardin@protonmail.com
Cc: greer.scott@gmail.com



RG

You decline to do so?

Sir, you have been electronically stalking me for the past 3 days with your nuisance emails while I have been at work. You demanded to meet when I was work.

Ok, so I will file a motion to quash. You're out of line and you have Crossed the line with this predatory behavior.

Dad, please hire an attorney to get out of this deposition. Do NOT agree to anything this crazy man says.

Sent from my iPhone

On Dec 19, 2024, at 12:16 PM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

I am not required to provide deposition questions in advance, and I decline to do so.

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
Email: MatthewDHardin@protonmail.com

On Thu, Dec 19, 2024 at 2:15 PM Russell Greer <russmark@gmail.com> wrote:
Mr. Hardin.

Before you begin harassing my witnesses, aka my family, I am going to need to see a list of questions you intend to ask. Pronto. If the questions are irrelevant, I will be filing a motion to quash.

I provided the witnesses in good faith, not for them to be harassed . I was given no notice of your intent with this.

If I do not receive a list of questions you intend to ask by Monday the 23rd, I will be filing a motion to quash your predatory actions

Sent from my iPhone, I

On Dec 19, 2024, at 10:35 AM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

<ScottGreerSubpoenaPackage.pdf>

Good morning, Mr. (Scott) Greer.

Thank you for your call this morning. As we discussed, please see attached a subpoena to appear for a deposition via Zoom or similar technology on February 10, 2025. You will receive a check in payment of the \$40 appearance fee in the mail.

Merry Christmas,

Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com



From: Russell Greer russmark@gmail.com
Subject: Re: Subpoena in Greer v. Moon et al.
Date: December 19, 2024 at 3:21 PM
To: Matthew Hardin matthewdhardin@gmail.com, kngreer@gmail.com

Nathan,

I am going to do my best to quash this deposition that I was not aware Hardin would be doing.

Please also get an attorney involved. Hardin is a very unethical person, who has been harassing me all week through emails.

Sent from my iPhone

On Dec 19, 2024, at 12:16 PM, Russell Greer <russmark@gmail.com> wrote:

Mr. Hardin.

Before you begin harassing my witnesses, aka my family, I am going to need to see a list of questions you intend to ask. Pronto. If the questions are irrelevant, I will be filing a motion to quash.

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Further, Nathan wishes to withdraw as a witness.

Sent from my iPhone

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Dear Mr. (Nathan) Greer:

Thank you for your telephone call and cooperation in scheduling this deposition. As we discussed, please see attached a Subpoena and Notice of Deposition. As indicated in the accompanying letter, a check has been mailed to your attention in the amount of 43.83.

Merry Christmas,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

<NathanGreerSubpoenaPackage.pdf>