

**Matthew D. Hardin (pro hac vice)**  
**HARDIN LAW OFFICE**  
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Livingston, TX 77399  
Telephone: (202) 802-1948  
Email: MatthewDHardin@gmail.com  
*Attorney for Defendants*  
*Joshua Moon and Lolcow, LLC*

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THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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<p>RUSSELL GREER,  Plaintiff,  v.  JOSHUA MOON, <i>et al.</i>  Defendants.</p>	<p><b>DEFENDANTS’ RESPONSE TO NOTICE OF SUPPLEMENTAL AUTHORITY (ECF NO. 303)</b></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 response to the Plaintiff’s Notice of Supplemental Authority (ECF No. 303). Defendants state as follows:

- 1) Mr. Greer began this morning by sending an email to both the Magistrate Judge and the District Judge referring to undersigned counsel as “Mr. Stalker.” Exhibit A.
- 2) Mr. Greer later followed up via email to undersigned counsel directly (without cc’ing the Court) to say, *inter alia*, that undersigned counsel should “Fuck off. Kindly.” Exhibit B.

WHEREFORE, undersigned counsel respectfully submits that Mr. Greer’s recent behavior is inconsistent with the orderly adjudication of this case, and interferes in the

administration of justice for the reasons previously pointed out at ECF No. 305. Undersigned counsel further submits that Mr. Greer's Motion for an Order to Show Cause, ECF No. 299, should be denied in light of Mr. Greer's extreme and abusive behavior.

DATED May 21, 2025

**HARDIN LAW OFFICE**

*/s/ Matthew D. Hardin*

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**Matthew D. Hardin**

*Attorney for Defendants*

*Joshua Moon and Lolcow, LLC*



**From:** Russell Greer RussMark@gmail.com  
**Subject:** Re: Proposed Order granting Motion for Extension of Time (ECF No. 305)  
**Date:** May 21, 2025 at 11:26 AM  
**To:** Matthew Hardin matthewdhardin@gmail.com  
**Cc:** utdecf\_barlow@utd.uscourts.gov, utdecf\_bennett@utd.uscourts.gov

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Thanks for the email, Mr. Stalker

Russell Greer  
CEO of ID LLC/Paralyzed Face Productions/CART U  
NV Bus. License #NV20222557279  
www.russellgreer.com  
IMDB Profile: [https://www.imdb.com/name/nm10428966/?ref\\_=ext\\_shr\\_lnk](https://www.imdb.com/name/nm10428966/?ref_=ext_shr_lnk)

Sent from my iPhone

On May 21, 2025, at 7:54 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

Please see the attached proposed order. I am unclear whether this order should be reviewed by Magistrate Judge Bennett or District Judge Barlow, so I am copying both chambers.

Thank you,

**Matthew D. Hardin**  
**Hardin Law Office**  
Direct Dial: 202-802-1948  
NYC Office: 212-680-4938  
Email: [MatthewDHardin@protonmail.com](mailto:MatthewDHardin@protonmail.com)  
<ProposedOrderExtTimeGreer.docx>

**From:** Russell Greer russmark@gmail.com  
**Subject:** Re: Fraud on the Court?  
**Date:** May 21, 2025 at 1:05 PM  
**To:** Matthew Hardin matthewdhardin@gmail.com  
**Cc:** Waylon Huber waylon@robinhoodrealtynv.com



Matthew,

You are insane. This is why I'm pursuing criminal charges against you for stalking . I actually took off work to go to the police to get you to stop. Heading there right now.

First off, stop contacting people connected to me.

Secondly, I never fucking lied. I have said it was investor money I was relying on.

Third, I have two month long emails from Roger saying he was open to it. He withdrew because he claimed the city wouldn't vote for it. That's why I didn't propose the zone at the meeting. I had told the city clerk that we were considering a different property.

I have stated multiple times that I was relying on investors. I never said I personally had the money. I even told Waylon I had little money and was relying on investors.

None of this has to do with copyright. Funny enough, you yourself have roped yourself with criminal charges.

Do not contact me or Waylon again. I also have to file a restraining order against you today

What a good way to lose your law license.

Fuck off. Kindly.

Sent from my iPhone

On May 21, 2025, at 9:16 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good morning, Mr. Greer,

I have obtained (and am attaching for your reference) the Meeting Minutes from the May 6, 2025 City Council meeting in Winnemucca. I note two interesting items in these minutes:

*First*, it appears you told the Winnemucca City Council that you had attempted to purchase the Scott Shady motel. But you made this offer to purchase a substantial piece of commercial real estate while simultaneously professing to the U.S. District Court in Utah that you were too poor to pay \$402 in filing fees and \$1,000 in sanctions awarded for your "recalcitrant" behavior. The owners, apparently, were not willing to sell. But you decided it was an "emergency" to rezone their property anyway, and told the U.S. District Court you could not possibly attend a hearing there on May 6 because of this "emergency" in Winnemucca.

*Second*, it appears you attempted to acquire and rezone property without the consent of the property owner. As reflected in public comments from Roger Bayloq, the Scott Shady Court Motel — which promotes itself as being "family friendly" in all its advertisements — was unaware of your rezoning request until they saw it appear on a City Council Agenda. This family-friendly motel was particularly troubled to see its name appear in connection with your brothel advocacy on a public City Council Agenda, for the first time at your request and without even notifying them or obtaining their consent.

This appears to prove not only that you committed a fraud on the Utah U.S. District Court when you represented to that Court that you had an "emergency" in Winnemucca on May 6, but also that you committed a fraud when you told that Court that you were financially unable to pay court costs and the judgments which have been entered against you. Sadly, this is yet another instance in which we will have to seek sanctions. And even more unfortunately, you appear to have also roped a Winnemucca realtor into your frauds, and made him a witness. Do you have any explanation at all for why you should not be sanctioned in Utah for this blatant misrepresentation?

Best,

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



On May 21, 2025, at 11:26 AM, Russell Greer <RussMark@gmail.com> wrote:

Thanks for the email, Mr. Stalker

Russell Greer  
CEO of ID LLC/Paralyzed Face Productions/CART U  
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<ProposedOrderExtTimeGreer.docx>