

Matthew D. Hardin (*pro hac vice*)
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Attorney for Defendants
Joshua Moon and Lolcow, LLC

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

**DEFENDANTS' RESPONSE TO
NOTICE OF SUPPLEMENTAL
AUTHORITY (ECF NO. 303)**

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

District Judge David Barlow
Magistrate Judge Jared C. Bennett

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

Matthew D. Hardin

Attorney for Defendants

Joshua Moon and Lolcow, LLC



RG

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

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

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

<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



RG

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 Baylocq, 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

M050625 SIGNED.pdf



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
NV Bus. License #NV20222557279
www.russellgreer.com
IMDB Profile: https://www.imdb.com/name/nm10428966/?ref_=ext_shr_lnk

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<ProposedOrderExtTimeGreer.docx>