



Russell Greer
1155 E Twain Ave
Ste 108420
Las Vegas, NV 89169
801-895-3501
russmark@gmail.com

**IN THE 5TH JUDICIAL DISTRICT COURT OF
COUNTY OF CLARK, STATE OF NEVADA**

RUSSELL GREER,

Plaintiff

v.

SYBIL STALLONE

Defendant

**MOTION TO VOLUNTARILY
DISMISS THE CASE WITHOUT
PREJUDICE**

Case No.: **A-23-881033-C**

Plaintiff Russell Greer files this motion and says:

INTRODUCTION

Plaintiff filed this case in good faith in 2022 after being the victim of a smear campaign by individuals on a Neo Nazi website called, Kiwi Farms. The Court can read about them here:

<https://www.motherjones.com/politics/2023/02/kiwi-farms-die-drop-cloudflare-chandler-trolls/>

The Website that wants you to kill yourself. Mother Jones. (2022). Greer was unaware Sybil was a user on that site until earlier this year when he asked her through private email to retract her false statements in exchange to dismiss the case. Apparently, the email prompted a deranged kiwi farms user a few minutes later to begin spamming Greer through email and the individual referenced this case and Sybil.

In other words, after Greer emailed Sybil, she passed the email to the kiwi farms community who in turn responded in the way the article documented.

The case was proofread by a lawyer who ended up moving to Washington DC and thus could not represent Greer.

Greer proceeded to file in justice court because he has a paralegal degree and a good understanding of the substantive aspect of the law. Greer admittedly made a blunder procedurally by mistaking to fail to read the rules of no defamation cases being allowed in Justice court. He had tried transferring the case to district court, but couldn't pay the fee online and wasn't able to pay in-person in time.

Since the case filing, a multitude of problems have plagued Plaintiff and this case and he will list those problems: (1) problem with trying to serve Sybil, (2) witness no longer in Nevada.

Service problems

The most obvious problem is that Sybil Stallone is not her real name. It's an Alias used for sex work. That makes serving her difficult. As the record reflects, the Justice court refused to allow alternative service by serving Sybil through email, etc. In fact, to prove that Sybil is aware

of this case, she immediately quit her Brothel gig and so it has made service impossible because that was the plan was to have a person serve the lawsuit to Sybil at the brothel. Also, no process servers wanted to walk inside a brothel, proving how strange and difficult this case is.

Witness No Longer in Nevada

As reflected in the Complaint, a very lovely and kind woman named Anika alerted Greer to Sybil's defamation. Greer made the mistake of not asking for physical evidence of what was actually said and Anika thereafter quit the brothel and Greer could never obtain any email copies from her. The plan was to subpoena the email server of Sheri's Ranch to obtain the emails but Greer knows that will be a battle in of itself. Also, Anika doesn't live in Nevada anymore and so subpoenaing her to vegas would be costly.

Therefore, because Greer failed to obtain physical evidence of what was said and because the witness is no longer in nevada and because Sybil has ran away from facing what she wrote, it's next to impossible for this case to move forward without (1) knowing how to serve Sybil and (2) knowing exactly what was said by Sybil. He is only going off of the words of a witness who doesn't live in Nevada. Because of that, Greer asks for the case to be voluntarily dismissed — without prejudice.

Greer asks for without prejudice because once he can locate Sybil or obtain what was said, he would re-file. But it's unfair to this Court for this case to sit in limbo. Plaintiff appreciates the Court's patience.

CONCLUSION

Greer kindly asks for this case to be dismissed WITHOUT PREJUDICE.

Respectfully submitted,

Russell Greer

/rgreer/

Date: 12-4-24

