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**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH**

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**RUSSELL GREER**

Plaintiff

v.

**JOSHUA MOON ET AL,**

Defendants

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**PLAINTIFF'S OPPOSITION RESPONSE  
IN REPLY TO DEFENDANTS' MOTION  
TO EXCLUDE WITNESSES**

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

Plaintiff Russell Greer comes now and opposes the motion to exclude to witnesses.

### **FACTS**

The case before us is unprecedented because it involves an LLC that owns a notorious website and its owner, whose sole goal is to torment others through the guise of “free speech”. This is a well-documented fact: <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).

The surviving claim of this case involves copyright infringement.

Plaintiff adhered to the Court’s schedule and had drafted out the initial disclosure on 12-24 and didn’t submit it to Defendants until 12-3-24.

### **WITNESSES**

At issue are Defendants’ contentions pertaining to unidentified witnesses. As the initial disclosures showed, Plaintiff has witnesses who can testify regarding market value damages and the sabotage Kiwi Farms has done to marketing Greer’s intellectual properties. Greer is fine disclosing their names.

### **FEAR OF WITNESS TAMPERING/HARASSMENT**

What Plaintiff is fearful of is Defendant Moon publishing the names and contact info onto his site, which will then inspire Moon’s users to intimidate the witnesses.

Mr. Hardin has not said verbatim that Mr. Moon promises not to publish any private information. **EXHIBIT A.**

Greer opposes the motion to exclude the witnesses because they can testify to damages that he has suffered through the copyright infringement.

Greer would suggest that Mr. Hardin promise verbatim to not publish the information. He has refused to give such a promise. He only referenced a protective order, but never said if Moon can see it.

Respectfully

DATED: December 5, 2024

Russell Greer

/rgreer/

Pro Se

**CERTIFICATE OF SERVICE:**

Pursuant to FRCP 5(b), I certify that on December 5th, 2024, I served a true and correct copy of the attached document by ECF to all attorneys on record

**EXHIBIT A**

