



From: Matthew Hardin matthewdhardin@gmail.com
Subject: Re: Evidence disclosure
Date: December 29, 2024 at 2:42 PM
To: Russell Greer russmark@gmail.com

If you have "a lot" of evidence, then yes, you are required to provide "a lot" of information under Rule 26. Please comply with the rule.

Thanks,

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

The information contained in this message may be privileged. It is intended by the sender to be confidential. If you suspect you may not be the intended recipient, please notify the sender and delete all copies.

On Dec 29, 2024, at 2:32 PM, Russell Greer <russmark@gmail.com> wrote:

And so please if you want a list, I can provide a list. But there's a lot.

Sent from my iPhone

On Dec 29, 2024, at 11:30 AM, Russell Greer <russellgreer27@icloud.com> wrote:

Matthew,

This is an example of what I'm talking about: I never saw any email asking me what protective order you violated.

1. I provided you a description of the evidence. Are you wanting a list? A numbered list?
2. The protective order said you would keep all Information (witnesses; etc) secret. You published the names, emails and phone numbers of my family. That in turn caused a kiwi farmer to harass me. And so by publishing private information, you violated the protective order.

Sent from my iPhone

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 Dec 29, 2024, at 11:15 AM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

My reply to your filing at ECF No. 202 is due tomorrow. I therefore write to request that you respond to the email below, so that I do not inaccurately present your position in my reply. Are you saying you have already produced a description of the relevant documents under Rule 26, or is it your position that you have no such documents to produce/describe?

Thank you,

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

On Dec 26, 2024, at 1:55 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Good afternoon,

I'm confused by your recent filings. In them, you say that you have disclosed evidence to me (including, presumably, your email below from December 23, 2024). But in your December 4, 2024 email to me, you stated "I clearly said in the documents, there is nothing relevant at this time. I have images of the emails of his users harassing me and the countless Instagram accounts harassing me that post links to kiwi farms, but as you have pointed out to the judge, that has nothing to do with copyright infringement."

I therefore ask: Is it your position that you have nothing relevant to disclose with relation to your claims of copyright infringement, or is it your claim that you have disclosed everything to me?

Additionally: You have now accused me in at least three filings of violating the protective order, and have stated in today's filings that you intend to separately move for sanctions against me. But you have never answered my email from December 17, 2024 in which I asked you which paragraph of the protective order you believe I violated. Please explain the nature of the violation you are alleging, with reference to a specific page or paragraph of the protective order.

Best,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

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Email: MatthewDHardin@protonmail.com

On Dec 23, 2024, at 7:43 AM, Russell Greer <russmark@gmail.com> wrote:

Per the federal rules, please find attached evidence that of myself telling Good Reads about the kiwi farms site, after the kiwi farms users got good reads to remove positive reviews from my book.

This is relevant evidence because it shows market value damage, as I'm not even able to hold positive reviews on my works without Joshua Moon's users sabotaging me.

Please also consider the several emails I have forwarded to you since October as relevant evidence too.

Thanks.

<image0.png>