



From: Russell Greer RussMark@gmail.com
Subject: Re: Subpoena / Notice of Deposition
Date: December 20, 2024 at 11:07 AM
To: Matthew D. Hardin matthewdhardin@gmail.com

How did you not know this? I literally told you in my replies to your emails. That's on you for sending so many successive messages that you can't keep track of my replies.

Further, you were wanting a same day meeting when you asked to meet and confer. I can't do same day things, mostly because I didn't have my phone on me.

But I work 6-3 pm pst.

I can definitely try to schedule a meeting, however, my question is why are you so aggressive. I listed the witnesses as people who *might* have information. I didn't realize the ramifications and they are not happy with you subpoenaing them. I'm asking if we can file a stipulation motion to exclude Scott and Nathan Greer as witnesses.

Sent from my iPhone

On Dec 20, 2024, at 5:57 AM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

Good morning,

This is the first I am hearing that you cannot engage in Rule 37-1 conferences because you are at work. I'm not sure there's very much that can be done about that, because courts and lawyers work during business hours. After all, I am also at work when I ask to meet and confer as the rule requires. But due to the time difference between Nevada and the East Coast, I am prepared to meet with you early in the morning if you would like. 9 a.m. Eastern Time should be 6 a.m. Pacific Time, and might alleviate your concerns about missing work.

I assume you will be complying with the Rule 37-1 before sending your motion to quash, and am happy to coordinate with you to arrange a conferral at 9 a.m. Eastern Time if that addresses your concerns. Just send me proposed dates and times as the rule requires.

Merry Christmas,

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

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On Dec 19, 2024, at 3:20 PM, Russell Greer <russmark@gmail.com> wrote:

You decline to do so?

Sir, you have been electronically stalking me for the past 3 days with your nuisance emails while I have been at work. You demanded to meet when I was work.

Ok, so I will file a motion to quash. You're out of line and you have crossed the line with this predatory behavior.

Dad, please hire an attorney to get out of this deposition. Do NOT agree to anything this crazy man says.

Sent from my iPhone

On Dec 19, 2024, at 12:16 PM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

I am not required to provide deposition questions in advance, and I decline to do so.

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

On Thu, Dec 19, 2024 at 2:15 PM Russell Greer <russmark@gmail.com> wrote:
Mr. Hardin.

Before you begin harassing my witnesses, aka my family, I am going to need to see a list of questions you intend to ask. Pronto. If the questions are irrelevant, I will be filing a motion to quash.

I provided the witnesses in good faith, not for them to be harassed . I was given no notice of your intent with this.

If I do not receive a list of questions you intend to ask by Monday the 23rd, I will be filing a motion to quash your predatory actions

Sent from my iPhone, I

On Dec 19, 2024, at 10:35 AM, Matthew D. Hardin <matthewdhardin@gmail.com> wrote:

<ScottGreerSubpoenaPackage.pdf>

Good morning, Mr. (Scott) Greer.

Thank you for your call this morning. As we discussed, please see attached a subpoena to appear for a deposition via Zoom or similar technology on February 10, 2025. You will receive a check in payment of the \$40 appearance fee in the mail.

Merry Christmas,

Matthew D. Hardin

Hardin Law Office

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NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

