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U.S. DISTRICT COURT

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RUSSELL GREER

Plaintiff

v.

JOSHUA MOON ET AL,

Defendants

**PLAINTIFF’S NOTICE OF
SUPPLEMENTAL AUTHORITY OF 1-6-
25 MEET & CONFER STIPULATION
ALLOWING PLAINTIFF TO FILE AN
AMENDED INITIAL DISCLOSURE LIST**

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

Plaintiff Russell Greer comes now and files this Notice of Supplemental Authority.

1-6-25 Meet and Confer Stipulation

On 1-13-25, Defendants filed a notice (ECF 215) seeking to disallow an amended initial disclosure list that plaintiff had filed.

This notice was odd because on 1-6-25, both parties agreed plaintiff could file an amended initial disclosure evidence list. **EXHIBIT A.**

So not only was the ECF 215 very strange, since both parties agreed to an amended list, but it is a sign of unprofessionalism and dishonesty coming from defendants. Plaintiff was even frustrated with Defendants for filing their strange ECF 215, saying, “why do you always do this!”. **EXHIBIT B.**

Counsel Hardin is not authorized to practice law in Utah. He is appearing pro hac vice. This court accepted his admission to practice pro hac vice. Given these long string of abusive notices from defendants (if the court may recall the March 2024 notices of Counsel Hardin protesting dates on documents), and now in light of ECF 215, which shows Defendants’ dishonesty by not wanting to allow an amended initial disclosure (saying it was untimely) after both parties literally agreed at a 1-6-25 meet and confer that Plaintiff could file an amended evidence list, Plaintiff is looking into seeing if Mr. Hardin’s admission to practice pro hac vice can be reconsidered. Theses notices of his are wasting judicial resources and they are now showcasing his dishonesty by going against a stipulation he agreed to.

Respectfully

DATED: 1-14-25.

Russell Greer

/rgreer/

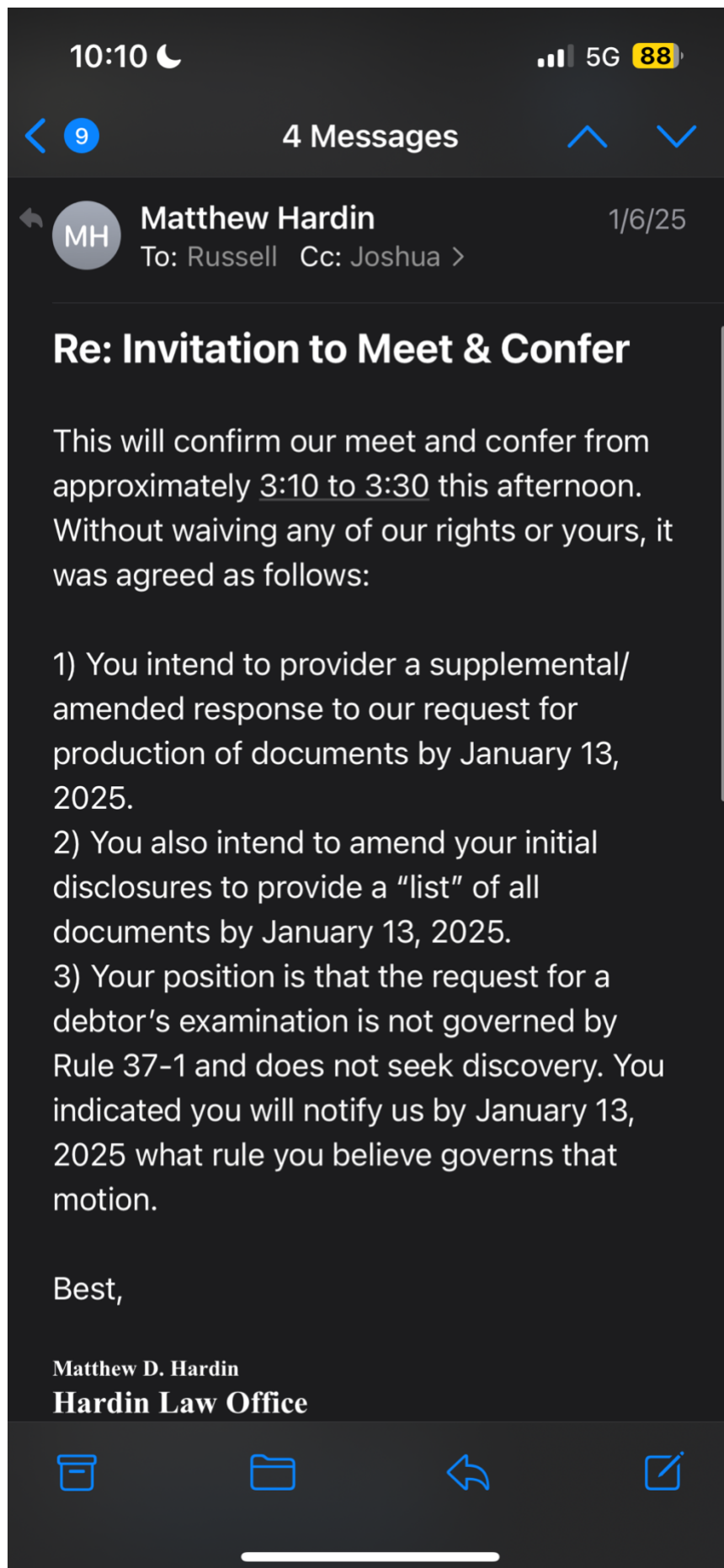
Pro Se

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on 1-14-25, I served a true and correct copy of the attached document by email to all attorneys on record

EXHIBIT A

**1-6-25 joint stipulation that Plaintiff Could File an Amended Initial Disclosure Evidence
List**



Re: Invitation to Meet & Confer

This will confirm our meet and confer from approximately 3:10 to 3:30 this afternoon. Without waiving any of our rights or yours, it was agreed as follows:

- 1) You intend to provide a supplemental/amended response to our request for production of documents by January 13, 2025.
- 2) You also intend to amend your initial disclosures to provide a "list" of all documents by January 13, 2025.
- 3) Your position is that the request for a debtor's examination is not governed by Rule 37-1 and does not seek discovery. You indicated you will notify us by January 13, 2025 what rule you believe governs that motion.

Best,

Matthew D. Hardin
Hardin Law Office

EXHIBIT B

1-13-25 email

