

**NO. 141-307474-19****VICTOR MIGNOGNA**  
**Plaintiff,**

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**IN THE DISTRICT COURT**

§

§

**V.**

§

**141st JUDICIAL DISTRICT**

§

**MONICA RIAL, RONALD TOYE,**  
**FUNIMATION PRODUCTIONS, LLC, and**  
**JAMIE MARCHI**  
**Defendants.**

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**OF TARRANT COUNTY, TEXAS****RESPONSE TO MOTION TO QUASH AND FOR ENTRY**  
**OF CONFIDENTIALITY AND PROTECTIVE ORDERS**  
**AND MOTION TO COMPEL****TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COME** Defendants, Monica Rial and Ronald Toye, “Defendants” herein, and file this Response to a Motion to Quash and Entry of Confidentiality and Protective Orders and Motion to Compel and would show the following:

**I.**

1. As shown below, Defendants’ counsel contacted Plaintiff’s counsel to arrange a mutually convenient time and place for the deposition. Defendants served a notice of deposition and a request for documents more than thirty days before the deposition to provide the requisite notice for a deposition that requests a party to produce documents. At first, Plaintiff’s counsel agreed to the time and place of the deposition, and, relying on that agreement, Defendants scheduled the deposition.

2. Next, Plaintiff’s counsel inexplicably changed his mind and started making various demands and adding conditions which he insisted on an agreement or he would cancel the deposition. Many of these conditions were requests for Defendants to waive legal rights and remedies that are critical to their defense.

3. Eventually, Plaintiff did cancel the deposition using made-up excuses. Worse, Plaintiff files an unsupported, haphazard motion to avoid the deposition and running up thousands of dollars of attorney's fees and expenses. The following timeline depicts why Plaintiff's actions here are obstructive and wasteful.

**Defendants' Efforts for Discovery and to Request a Deposition:**

a. **On Thursday, April 25**, in accordance with Tex. R. Civ. P. 21(a) and 21a, and Local Rule 3.11, Defendants served Plaintiff with a Notice of Deposition and a request for documents for Mr. Mignogna's deposition to occur on May 30<sup>th</sup> in Plaintiff's counsel's office in Tyler, Texas. Defendants offered to work with Plaintiff's schedule in order to conduct the deposition at a time that was convenient for Plaintiff.<sup>1</sup>

b. **On Thursday, April 25, 2:57 p.m.**, Plaintiff's email acknowledged receipt of the deposition notice (and request for documents) and stated:<sup>2</sup>

*I received your notices for deposition. I think that May 30 is fine with us; I need to confirm one item though. If you don't hear from me by 8 am tomorrow, assume that we're good. I would also like to depose Monica Rial on 5/31 at your office and Ron on 6/3 at your office. Are those dates good for you and your clients?*  
--Ty

c. **On Friday, April 26, 2019, 5:11 p.m.**, Plaintiff's email stated:

*Hey Casey. I had to deal with a serious emergency, so I wasn't able to confirm the deposition dates. Were you able to confirm the proposed dates for your clients?*  
--Ty

d. **On Friday, April 26, 5:26 p.m.**, Defendants responded with:

*When 8 AM came and went I directed my staff to arrange for the court reporter and videographer, so they are set up for May 30. If*

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<sup>1</sup> See Exhibit A and B, April 25, 2019 cover letter and Notice of Deposition and Requests for Production.

<sup>2</sup> See Exhibit C, May 9, 2019 letter to Plaintiff's counsel detailing the communications between counsel.

*that now needs to change then we need to leave May 31 and June 3 open because your client's depositions will be first before mine. However, I am visiting with the clients to firm up dates for you.*

*But for me to do that, I need your client to commit to May 30 or as close as possible to May 30th.*

- e. **On Thursday, May 2, 7:08 p.m.**, Plaintiff's email stated:

*May 30th is fine for Mr. Mignogna's deposition. We can't do June 3 and 4, so I'll find other dates.*

*--Ty*

- f. **On Friday, May 3**, Plaintiff inexplicably served depositions notices (and document requests) for Defendants' depositions to occur on May 15, in Plaintiff's counsel's Tyler, Texas office. Scheduling the depositions in Tyler, Texas violates Local Rule 3.11(a)(1).

- g. **On Friday, May 3, 4:45 p.m.**, Defendants responded with:

*Mr. Beard, I received [sic] the deposition notices just now for Monica Rial and Ron Toye to occur on May 15.*

*Maybe I am confused, but you heard me say we will depose Mr. Mignogna first. And, in your last email, you indicated you were going to review your calendar and advise of other possible dates after Oregon Iron Co. v. Trullenger, 3 Or. 1, 4 (Or. Cir. 1867).*

*Now, despite these recent emails to each other, you unilaterally noticed my clients' depositions for May 15, without once asking whether we were available. We are not. I have a deposition that day in a matter pending in Dallas District Court and my clients are not available either.*

*I am also confused why you include the requests for documents knowing you did not allow thirty days to respond. Even if we could appear for deposition on the 15th, which we cannot, I would not provide documents as the requests are untimely and served in violation of the Rules.*

*I would like to continue working with each other and will assume this was an oversight by your office.*

*In that spirit, I kindly ask that you withdraw your notices of depositions. If not, I will file the appropriate motion with the court on Monday.*

- h. **On Friday, May 3, 7:01 p.m.**, Plaintiff's email stated:

*Hey Casey. The subpoena duces tecums (sp?) were indeed inadvertently attached to the notices. Please disregard them.*

*Your complaint about me not contacting you ahead of time is curious since you did not contact me before noticing Mr. Mignogna. My policy is to treat opposing counsel precisely as well as they treat me. I'll be happy to enter into a mutual gentleman's agreement to confer on these issues in the future. Personally, I prefer to be reasonable with opposing counsel as that tends to improve the outcome for both sides.*

*Regarding who goes first, I am not aware of any rule that gives you the right to depose my client first.*

*That said, I am willing to agree to let you depose Mr. Mignogna first, but only if you agree to not file a motion to dismiss under the TCPA until we have the opportunity to depose your clients. My concern should be obvious-you could depose Mr. Mignogna and immediately file the motion to dismiss, which would trigger the discovery stay.*

*Please let me know whether this is agreeable to you. If it isn't please provide me with dates that are convenient to depose your client.*

*--Ty*

- i. **On Tuesday, May 7, 4:08 p.m.**, having not received a response to Defendants' request to withdraw the deposition notices, Defendants were forced to file a motion to quash and motion for a protective order, in addition to preparing objections to the forty-four document requests. Still, in Defendants' motion, they requested Plaintiff provide dates after June 3 or June 4 for Plaintiff's deposition, as indicated in Plaintiff's May 2<sup>nd</sup> email (above).

- j. **On Wednesday, May 8, 2:09 p.m.**, Plaintiff's email stated:

*Casey, five days ago, I asked you to give me availability dates to depose your clients. You have failed to do so. So please provide me with availability dates for two days from May 15 thru May 29, 2019.*

*In the alternative, please advise whether you will agree to a Rule 11 agreement to (a) depose Mr. Mignogna first; and (b) to not file a motion to dismiss under the TCPA until we've the opportunity to depose your clients.*

*Finally, will you agree to a Confidentiality Agreement that in which your clients and Mr. Mignogna will agree to not publicly discuss any of the deposition testimony? I think this is in everyone's best interest, since the matters discussed will be very personal for each deponent.*

*If I don't hear from you by noon tomorrow, I will interpret your silence to mean that you will not provide the availability dates, that you do not agree to the proposed Rule 11 agreement, and that you won't agree to a Confidentiality Agreement. In that case, we will file motions for a protective order and to quash the May 30 deposition of Mr. Mignogna. Please feel free to call me if you think we can work this out.*

*--Ty*

- k. **On Friday, May 10**, Defendants provide dates for their depositions to occur on: June 5, June 11, June 12, June 21, and June 24-28.<sup>3</sup> As of the date of this filing, Plaintiff has yet to notice Defendants' depositions for any of the dates provided. **Later that same day**, Plaintiff serves a letter now claiming Plaintiff is not available on May 30<sup>th</sup><sup>4</sup> and files his Motion to Quash and for Entry of Confidentiality Agreement and Protective Orders and a letter claiming Plaintiff is not available on the 30<sup>th</sup> but fails to provide any reason why.

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<sup>3</sup> See Exhibit D, May 10, 2018 letter to Plaintiff's counsel providing Defendants' deposition availability.

## II.

### **Defendant is entitled to take Plaintiff's deposition first**

4. It is well settled that the party who first notices a deposition is the first to proceed. This is a rule of practice that is followed by courts and experienced attorneys. Defendants requested and noticed Plaintiff's deposition first. Plaintiff also agreed to have his deposition first. While there is no procedural rule that touches on this directly, an insightful order comes from the 95<sup>th</sup> District Court, Dallas County, Texas.<sup>5</sup> This order specifically discusses the right of a defendant to take a deposition of the plaintiff first and the court confirms that defendant does have such right. Accordingly, Defendants request to take Plaintiff's deposition first.

## III.

### **A request for a confidentiality/protective order requires evidence**

5. A party seeking to avoid discovery must show particular, specific, and demonstrable injury by facts sufficient to justify a protective order. *In re Amaya*, 34 S.W.3d 354 (Tex. App.—Waco 2001, no pet.), citing *Garcia v. Peebles*, 734 S.W.2d 343, 345 (Tex. 1987) (“So long as the discovery sought is within the scope of Rule 166b [now 192], a trial court may not grant a protective order limiting discovery unless the party seeking such protection has met this burden.”); *In re Titus County*, 412 S.W.3d 28, 33 (Tex. App.—Texarkana 2013, no pet.); *Brewer & Pritchard, P.C. v. Johnson*, 167 S.W.3d 460, 466 (Tex. App.—Houston [14th Dist.] 2005, pet. denied)); *In re Amaya*, 34 S.W.3d 354. The party moving for protection may not simply make conclusory allegations that the requested discovery was unduly burdensome or duplicative, but instead must produce some evidence supporting the request. *Garcia*, 734 S.W.2d at 345; *In re State Auto Prop. & Cas. Ins. Co.*, 348 S.W.3d 499, 502 (Tex. App.—Dallas 2011,

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<sup>4</sup> See Exhibit E, May 10, 2019 letter from Plaintiff's counsel cancelling deposition.

<sup>5</sup> See Exhibit F, Order dated November 27, 2012, Cause No. DC-11-13742-D, Sintia Hutchinson v. Kerrick Darrel

pet. struck)).<sup>6</sup>

6. For example, in *In re Amaya*, 34 S.W.3d 354: the judgment creditor served a subpoena duces tecum on the judgment debtor's daughter. The daughter moved for an order of protection but failed to support it with any evidence. The court held that the record contained no evidence of any particular, specific, and demonstrable injury that would be caused to the daughter by requiring compliance with the notice of deposition. The court concluded that although a notice of deposition may be harassing, burdensome and annoying, the law provides that unless the purpose of the deposition can be shown to be only for an improper purpose, or unless it is an undue burden, the trial court may not quash the notice of deposition. Conclusory allegations are not adequate. *Id.* at 356–57. As stated in paragraph 1 of this Response, Defendants have a proper and legitimate reason to depose Plaintiff, and such deposition is not unduly burdensome as Plaintiff's counsel agreed to the deposition.

7. Similarly, in *Indep. Insulating Glass/Sw., Inc. v. St.*, 722 S.W.2d 798 (Tex. App.—Fort Worth 1987, writ dismissed), the Fort Worth Court of Appeals held that “Any party who seeks to exclude matters from discovery on grounds that the requested information is unduly burdensome, costly or harassing to produce, has the affirmative duty to plead and prove the work necessary to comply with discovery. *Independent Insulating Glass/Southwest, Inc.*, 722 S.W.2d at 802. Otherwise, the trial court cannot make an informed judgment on whether to limit discovery on any of these bases. *Id.* As such, failure to follow this procedure constitutes a waiver of any complaint of the trial court's action. *Id.*

8. A person seeking to avoid discovery for reasons other than a privilege or

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Greer and Wells Fargo Bank, N.A., in the 95<sup>th</sup> District Court of Dallas County, Texas.

<sup>6</sup> Although unclear from Plaintiff's motion, a request for a confidentiality under Rule 76a also requires the party to provide evidence. Therefore, whether Plaintiff's request is made per Rule 192.6 or Rule 76a, Plaintiff's failure to provide any evidentiary support warrants denying a confidentiality order.

immunity (i.e., undue burden, unnecessary expense, harassment or annoyance, or invasion of personal, constitutional or property rights) may also be required to produce evidence in support of the objection. *Masinga v. Whittington*, 792 S.W.2d 940, 942 (Tex. 1990) (concurring opinion); *Blankinship v. Brown*, 399 S.W.3d 303, 312 (Tex. App.—Dallas 2013, pet. denied). Plaintiff has not provided any such evidence.

**Plaintiff does not provide any evidence to support a confidentiality/protective order**

9. In connection with the Motion to Quash, Plaintiff seeks a protective order but does not provide any evidence. Instead, Plaintiff relies on generally accusing Defendants of some possible nefarious reasons for the deposition and concludes that the parties may be embarrassed and therefore need a protective order. As demonstrated above, Plaintiff's failure to support these allegations with any evidence should cause the request to be summarily denied.

10. Plaintiff's actions outside of this lawsuit have proven that his request for confidentiality is a disingenuous and he is wasting the courts valuable time and resources. Plaintiff's attorneys have appeared on episodes of the YouTube channel for Rekieta Law<sup>7</sup> describing the facts of the case, the pleadings and the Defendants, providing images of evidence they intend to use in the case, and discussing their legal strategy. Rekieta Law is a YouTube channel that describes on its own webpage the following: "*He's a lawyer who lawsplains [sic] legal topics to the internet, fueled by whiskey and rage.*"<sup>8</sup> Plaintiff's attorneys are sharing information about the case with Nick Rekieta, the creator of the YouTube channel, to be disbursed to Plaintiff's fanbase and viewers of Rekieta Law. Many of Rekieta Law's episodes have over 75,000 views from different individuals. Furthermore, Plaintiff's attorneys have even attempted to sell merchandise (patches and t-shirts) in support of Ty Beard and Plaintiff with the

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<sup>7</sup> See attached images as Exhibit G

<sup>8</sup> See attached images as Exhibit H



slogan “Fear the Beard” as a way to intimidate Defendants and rile up the fanbase of Plaintiff.<sup>9</sup> The amount of publicity and public attention that Plaintiff voluntarily created, and continues to create, regarding this case shows that he has no actual concern for the protection of confidentiality or the sensitivity of the subject matter.

IV.

**Plaintiff does not identify a reasonable time and place to be deposed**

11. To object to the time or place designated for an oral deposition, the party or witness must file a motion for protective order or a motion to quash the notice of deposition. Tex. R. Civ. P. 192.6(a), 199.4; see, e.g., *Bohmfalk v. Linwood*, 742 S.W.2d 518, 520 (Tex. App.—Dallas 1987, no writ) (party waived argument about inadequate notice of deposition because he did not file a motion for protective order to reschedule). The motion must identify a reasonable time and place for the deposition with which the party or witness will comply. Tex. R. Civ. P. 192.6(a); *Grass v. Golden*, 153 S.W.3d 659, 662 (Tex. App.—Tyler 2004), subsequent mandamus proceeding sub nom. *In re Grass*, 12-04-00151-CV, 2004 WL 3021876 (Tex. App.—Tyler Dec. 30, 2004, no pet.).

12. Because Plaintiff does not provide a reasonable time and place for his deposition, he has waived any objection and the Court should deny the motion.

V.

**MOTION TO COMPEL DEPOSITION OF PLAINTIFF**

13. The purpose of discovery is to seek the truth so that disputes may be decided by what facts are revealed, not by what facts are concealed. *Axelson, Inc. v. McIlhany*, 798 S.W.2d 550, 555 (Tex. 1990). A party may seek discovery of any matter that is relevant to the subject matter and proportional to the needs of the case. See Tex. R. Civ. P. 192.3(a), 192.4(b); *In re*

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<sup>9</sup> See attached images as Exhibit I.

*State Farm Lloyds*, 520 S.W.3d 595, 607 (Tex. 2017). Discovery can include evidence that may be inadmissible as long as it “appears reasonably calculated to lead to the discovery of admissible evidence.” Tex. R. Civ. P. 192.3(a).

14. When a party serves objections or claims of privilege to a discovery request or files a motion to quash or a motion for protective order, the party seeking discovery can either move for a hearing on the objections or file a motion to compel production, or both. Tex. R. Civ. P. 193.4(a), 215.1(b); see *McKinney v. Nat’l Union Fire Ins. Co. of Pittsburgh, Pennsylvania.*, 772 S.W.2d 72, 75 (Tex. 1989); see, e.g., *Pace v. Jordan*, 999 S.W.2d 615, 622 (Tex. App.—Houston [1st Dist.] 1999, pet. denied)). A court may compel a party to appear at a deposition the party previously refused to attend. Tex. R. Civ. P. 215.1(b)(2)(A).

15. The request for the deposition of Plaintiff Vic Mignogna was timely served, and his testimony and documentary evidence are relevant to his claims. Plaintiff does not provide any justifiable reason or evidence which would warrant unilaterally canceling the deposition. Defendants, therefore, seek an order compelling Plaintiff to appear for his deposition.

## VI.

### **REQUEST FOR ATTORNEYS FEES AND COSTS PURSUANT TO Tex. R. Civ. P. 215.1(d) AND LOCAL RULE 3.12**

16. Plaintiff’s deliberate attempts to avoid a properly noticed deposition *could* rise to the level of sanctions. Certainly, filing a motion that includes only unsupported, conclusory allegations *should* give rise to sanctions. As the Texas Supreme Court stated in *Masinga*, 792 S.W.2d 940, “the conclusory allegations of the movant amounted to little more than a general objection to any form of discovery authorized by Tex.R.Civ.P. 202(1). As such, in the future this type of motion could support the entry of sanctions rather than the granting of relief. *Masinga*, 792 S.W.2d at 941. Rule 215 provides “[t]he court may, after opportunity for hearing, require the

### **RESPONSE TO MOTION TO QUASH AND FOR ENTRY OF CONFIDENTIALITY AND PROTECTIVE ORDERS AND MOTION TO COMPEL – Page 10**

moving party [or attorney] ... to pay to the party ... who opposed the motion the reasonable expenses incurred in opposing the motion, including attorneys' fees.” Tex. R. Civ. P. 215.1(d).

17. Defendants timely served their notice of deposition and request for documents. And, despite agreeing to the date and time for Plaintiff’s deposition, Plaintiff decides he does not want to be deposed but fails to provide any evidence in support of his motion to quash or request for protective order. At the same time, Plaintiff notices Defendants’ depositions to occur with inadequate notice and attempted to jockey for position by choosing earlier dates for them to occur. Next, even though Defendants have provided multiple dates for their depositions, Plaintiff has yet to serve a notice or attempt to schedule the depositions.

18. Defendants request the Court deny Plaintiff’s motion in its entirety and order Plaintiff’s deposition to be conducted with five (5) days of the order subject to being held in contempt if Plaintiff disobeys the order. Last, Defendants request that the Court award reasonable expenses incurred in opposing Plaintiff’s motion.


## VI.

### **PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Defendants request that the Court deny the Motion filed by Victor Mignogna, deny the improper request for a protective order, order Plaintiff’s deposition to occur within five (5) days, award Defendants’ reasonable expenses for Plaintiff’s conduct in avoiding his deposition and for filing a motion and request for protective orders without any discernable basis or evidence.


Respectfully submitted,

Kessler Collins, P.C.

By:   
Casey S. Erick  
Texas Bar No. 24028564  
Email: CErick@kesslercollins.com  
2100 Ross Avenue, Suite 750  
Dallas, Texas 75201  
Tel. (214) 379-0732  
Fax. (214) 373-4714  
Attorney for Defendants  
Monica Rial and Ronald Toyne

**CERTIFICATE OF CONFERENCE**

A conference was held via written correspondence with Mr. Ty Beard, counsel for Plaintiff, Vic Mignogna, on May 8-9, 2019, on the merits of this response and motion. A reasonable effort has been made to resolve the dispute without the necessity of court intervention, and the effort failed. Therefore, it is presented to the Court for determination.

By:   
Casey S. Erick

**CERTIFICATE OF SERVICE**

I certify that on May 28, 2019, a true and correct copy of Defendants' Response to Motion to Quash and for Entry of Confidentiality and Protective Orders and Motion to Compel was served on Mr. Ty Beard electronically through the electronic filing manager.


By:   
Casey S. Erick

EXHIBIT A



Thursday, April 25, 2019

**Via e-service**

Ty Beard, Senior Partner  
Beard Harris Bullock Hughes, Attorneys at Law  
100 Independence Place #300  
Tyler, Texas 75703

Re: Cause No. 141-307474-19; *Victor Mignogna, Plaintiff v. Funimation Productions, LLC, Jamie Marchi, Monica Rial, and Ronald Toye, Defendants*, 141<sup>st</sup> District Court, Tarrant County, Texas

Mr. Beard,

Enclosed is Defendants' Notice of Deposition and Subpoena Duces Tecum for the deposition of Victor Mignogna to occur on May 30, 2019, 10:00 a.m., in your office.

I am sure you appreciate the urgent need for this deposition in light of the pressing deadlines we are faced with a possible motion to dismiss. I look forward to working with you to get this scheduled.

Very truly yours,

A handwritten signature in blue ink, which appears to read "Carlos J. Enik", is written below the "Very truly yours," text.

EXHIBIT A

**NO. 141-30744-19**

**VICTOR MIGNOGNA**  
**Plaintiff,**

**V.**

**MONICA RIAL, RONALD TOYE, and**  
**FUNIMATION PRODUCTIONS, LLC**  
**Defendants.**

§ **IN THE DISTRICT COURT**  
§  
§  
§ **141st JUDICIAL DISTRICT**  
§  
§  
§ **OF TARRANT COUNTY, TEXAS**

**NOTICE OF INTENTION TO TAKE ORAL DEPOSITION**

To: Victor Mignogna, c/o Ty Beard, 100 Independence Place, Suite 101, Tyler, Texas 75703.

Please take notice that Defendants intend to take the oral deposition of Plaintiff, Victor Mignogna at 100 Independence Place, Suite 101, Tyler, Texas 75703, before a certified court reporter, commencing on May 30, 2019 at 10:00 a.m. The deposition will be videotaped.

Victor Mignogna is instructed to produce at the time and place of the taking of this deposition, for use in conjunction with the taking of the deposition, all documents identified in the attached Exhibit A.

Kessler Collins, P.C.



Casey S. Erick  
State Bar No.: 24028564  
Email: [CErick@kesslercollins.com](mailto:CErick@kesslercollins.com)  
Andrea Perez  
State Bar No.: 24070402  
Email: [APerez@kesslercollins.com](mailto:APerez@kesslercollins.com)  
2100 Ross Avenue, Suite 750  
Dallas, Texas 75201  
Tel. (214) 379-0732  
Fax. (214) 373-4714  
Attorneys for Defendants Monica Rial  
and Ronald Toye

**CERTIFICATE OF SERVICE**

I certify that on April 25, 2019 a true and correct copy of Plaintiff's Notice of Intention to Take Oral Deposition was served on Ty Beard electronically through the electronic filing manager.

A handwritten signature in blue ink, reading "Casey S. Erick". The signature is fluid and cursive, with the first name "Casey" and last name "Erick" clearly distinguishable.

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Casey S. Erick



EXHIBIT B

**EXHIBIT A**  
**DOCUMENTS TO BE PRODUCED**

- a. All documents supporting any claims for damages.
- b. All communications about your claims made in this lawsuit.
- c. All documents supporting your claim of defamation.
- d. All documents supporting your claim of tortious interference with existing contracts.
- e. All documents supporting your claim of tortious interference with prospective business relations.
- f. All documents supporting your claim of civil conspiracy.
- g. All documents/communications from any third party that relates to the claims and damages in your lawsuit.
- h. All documents and communications (including electronically-stored information in its native format) relating to the “investigation” referenced in the February 11, 2019 tweet posted to @FUNimation (Figure 3 in Plaintiff’s Original Petition).
- i. All documents and communications (including electronically-stored information in its native format) relating to the decision to post the February 11, 2019 tweets to @FUNimation (Figure 3 in Plaintiff’s Original Petition).
- j. All documents and communications (including electronically-stored information in its native format) relating to Funimation’s informing Anime News Network that Plaintiff’s employment (or contractual relationship) had been terminated (or otherwise ended).
- k. All documents and communications (including electronically-stored information in its native format) referencing Plaintiff or Defendants, from June 1, 2017 to the present.
- l. All documents and communications (including electronically-stored information in its native format) referencing Plaintiff between (a) the more recent of (i) the date you first met Defendants or (ii) January 1, 2014 and (b) the present.
- m. All documents and communications relating to any investigation conducted by Funimation Productions, LLC into allegations that Plaintiff assaulted, harassed, sexually assaulted, or sexually harassed any person or otherwise conducted himself inappropriately toward any person.

EXHIBIT C



Thursday, May 9, 2019

**Via e-service and email:** [ty@beardandharris.com](mailto:ty@beardandharris.com); [admin@beardandharris.com](mailto:admin@beardandharris.com); [jim@beardandharris.com](mailto:jim@beardandharris.com); [carey@beardandharris.com](mailto:carey@beardandharris.com); [laci.stovall@beardandharris.com](mailto:laci.stovall@beardandharris.com)

Ty Beard, Senior Partner  
Beard Harris Bullock Hughes, Attorneys at Law  
100 Independence Place #300  
Tyler, Texas 75703

Re: Cause No. 141-307474-19; *Victor Mignogna, Plaintiff v. Funimation Productions, LLC, Jamie Marchi, Monica Rial, and Ronald Toye, Defendants*, 141<sup>st</sup> District Court, Tarrant County, Texas

Mr. Beard,

Yesterday, **Wednesday, May 8**, you sent an email and identical fax demanding I immediately respond to various issues by noon today. In doing so, I will necessarily need to correct several misstatements you have made in your correspondence. In that regard, I turn to the following.

**On Thursday, April 25**, I e-served a cover letter and deposition notice (with a request for documents) for Mr. Mignogna's deposition to occur on May 30<sup>th</sup> in your Tyler, Texas office. I explained the reason I included the deposition notice and, at the same time, stated I would work with you to schedule the deposition.

**On Thursday, April 25, 2:57 p.m.**, your email acknowledged receipt of the deposition notice (and request for documents) and stated:

*I received your notices for deposition. I think that May 30 is fine with us; I need to confirm one item though. If you don't hear from me by 8 am tomorrow, assume that we're good. I would also like to depose Monica Rial on 5/31 at your office and Ron on 6/3 at your office. Are those dates good for you and your clients?*

--Ty

**On Friday, April 26, 2019, 5:11 p.m.**, your email stated:

*Hey Casey. I had to deal with a serious emergency so I wasn't able to confirm the deposition dates. Were you able to confirm the proposed dates for your clients?*

--Ty

EXHIBIT C

**On Friday, April 26, 5:26 p.m.**, I responded with:

*When 8 AM came and went I directed my staff to arrange for the court reporter and videographer so they are set up for May 30. If that now needs to change then we need to leave May 31 and June 3 open because your client's depositions will be first before mine. However, I am visiting with the clients to firm up dates for you.*

*But for me to do that, I need your client to commit to May 30 or as close as possible to May 30th.*

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*Maybe I am confused, but you heard me say we will depose Mr. Mignogna first. And, in your last email, you indicated you were going to review your calendar and advise of other possible dates after June 3 or 4.*

*Now, despite these recent emails to each other, you unilaterally noticed my clients' depositions for May 15, without once asking whether we were available. We are not. I have a deposition that day in a matter pending in Dallas District Court and my clients are not available either.*

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*Please let me know whether this is agreeable to you. If it isn't please provide me with dates that are convenient to depose your client.*

*--Ty*

**On Tuesday, May 7, 4:08 p.m.,** having not received a response to my request to withdraw the deposition notices, I was forced to file a motion to quash and motion for a protective order, in addition to preparing objections to the forty-four document requests you claimed were mistakenly included. For obvious reasons, without an executed Rule 11 agreement, I cannot rely on your comment to disregard them. Still, in our motion, I requested you provide dates after June 3 or June 4, as indicated in your May 2<sup>nd</sup> email (above).

**On Wednesday, May 8, 2:09 p.m.,** your email stated:

*Casey, five days ago, I asked you to give me availability dates to depose your clients. You have failed to do so. So please provide me with availability dates for two days from May 15 thru May 29, 2019.*

*In the alternative, please advise whether you will agree to a Rule 11 agreement to (a) depose Mr. Mignogna first; and (b) to not file a motion to dismiss under the TCPA until we've the opportunity to depose your clients.*

*Finally, will you agree to a Confidentiality Agreement that in which your clients and Mr. Mignogna will agree to not publicly discuss any of the deposition testimony? I think this is in everyone's best interest, since the matters discussed will be very personal for each deponent.*

*If I don't hear from you by noon tomorrow, I will interpret your silence to mean that you will not provide the availability dates, that you do not agree to the proposed Rule 11 agreement, and that you won't agree to a Confidentiality Agreement. In that case, we will file motions for a protective order and to quash the May 30 deposition of Mr. Mignogna. Please feel free to call me if you think we can work this out.*

*--Ty*

**Failure to confer for depositions**

I believe it is now clear that I did confer with you about your client's availability and you agreed, twice, to the May 30 deposition.

On April 25, I did ask for Mr. Mignogna's deposition on May 30<sup>th</sup>, to occur in your office, and the accompanying document requests were served in compliance with Tex.R.Civ.P. 199.2(b)(5).

That same day, you agreed to this date and said to move forward with scheduling if I did not hear from you by 8 a.m. the following day. Because I did not hear from you, I scheduled the deposition.

The next day you claimed there was an emergency that prevented confirmation and asked for my clients' availability. I advised we should wait for you to confirm a new date and leave May 31 and June 3 open if Mr. Mignogna's deposition needed to be rescheduled. I added that Mr. Mignogna needed to commit to May 30<sup>th</sup>, or a date as close as possible to May 30<sup>th</sup>, before we would know what alternative dates would be open for my clients.

I did not hear from you until May 2, and because the deadline to automatically stay the deposition by motion had passed, understandably assumed May 30 was confirmed. Even so, on May 2, you confirmed May 30 for Mr. Mignogna's deposition and advised June 3 and 4 were not available for you to take my clients' depositions and said you would find new dates. You still have not provided alternative dates after June 3 or 4 on which you want to depose my clients.

The next day, May 3, I received depositions notices for my clients to occur on May 15 in Tyler, Texas. You did not ever mention May 15 as a possible date. The first I heard of this was when I read the deposition notices. After which I informed you, I had a previously scheduled deposition on that day.

Despite failing to confer and knowing of my conflict, you did not withdraw the notices which forced the filing of the motion to quash and protective orders and caused my clients to incur completely unnecessary attorney's fees and expenses.

**Agreement to postpone TCPA motion until Plaintiff has  
“had the opportunity” to depose Defendants**

For obvious reasons, we cannot agree to an open-ended postponement of *our* TCPA filing deadline.

A party “seeking the TCPA’s protections must comply with the[se] requirements.” *Braun v. Gordon*, No. 05-17-00176-CV, 2017 Tex. App. LEXIS 9053, at \*2–3 (Tex. App.—Dallas Sept. 26, 2017, no pet.). A TCPA motion must be filed “not later than the 60th day after the date of service of the legal action.” CPRC § 27.003(b). The court may extend the deadline upon a showing of good cause by the movant. *Id.* There has not yet been an opinion interpreting what is required for good cause under this provision. It is within the trial court’s discretion. *See Schimmel v. McGregor*, 438 S.W.3d 847, 856 (Tex. App. -Houston [1st Dist.] 2014, pet. denied). Open questions also remain about whether the motion-filing deadline (and, presumably, other TCPA deadlines) can be tolled, stayed, or abated by the application of other procedural rules or statutes. *See, e.g., Hearst Newspapers, LLC v. Status Lounge, Inc.*, No. 14-17-00310-CV, 2017 Tex. App. LEXIS 11756, at \*25 (Tex. App.—Houston [14th Dist.] Dec. 19, 2017, no pet.).

Such an agreement is not possible given the strict deadlines in the TCPA and is declined.

**Vic Mignogna’s request for a Confidentiality Agreement**

In all candor, Mr. Mignogna’s request for a confidentiality agreement was surprising. First, the request seems to be a last-minute add on as it wasn’t mentioned before yesterday.

Frankly, I assumed Mr. Mignogna gave considerable thought to any personal privacy concerns before he filed his lawsuit. Regardless, my clients have considered his request and it is declined.

Ty, I took the time to give you a detailed response so that you and I are clear on how we got to this point.

To be certain, I do not believe a motion for protective order could be filed in good faith and not viewed as discovery abuse. My clients have already incurred considerable expense and time to schedule the deposition of your client, which began exactly two weeks ago today.

Even now, considerable time was spent responding to these last-minute antics and erratic proposals with only a few hours’ notice. Hopefully, we can avoid this in the future.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Craig J. Erickson".



EXHIBIT D



Friday, May 10, 2019

Via email: [ty@beardandharris.com](mailto:ty@beardandharris.com); [admin@beardandharris.com](mailto:admin@beardandharris.com)

Ty Beard, Senior Partner  
Beard Harris Bullock Hughes, Attorneys at Law  
100 Independence Place #300  
Tyler, Texas 75703

Re: Cause No. 141-307474-19; *Victor Mignogna, Plaintiff v. Funimation Productions, LLC, Jamie Marchi, Monica Rial, and Ronald Toye, Defendants*, 141<sup>st</sup> District Court, Tarrant County, Texas

Mr. Beard,

Ms. Monica Rial and Mr. Ronald Toye are available for their depositions, to occur in my office, on:

June 5  
June 11  
June 12  
June 21  
June 24-28.

Please advise.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Casey S. Erick", is written over a light blue rectangular background.

Casey S. Erick

EXHIBIT D

EXHIBIT E



FILED  
TARRANT COUNTY  
5/10/2019 2:29 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**BEARD • HARRIS • BULLOCK • HUGHES**

**ATTORNEYS AT LAW**

141-307474-19

May 10, 2019

Mr. Casey Erick  
Kessler Collins  
2100 Ross Avenue Suite 750  
Dallas, TX 75201

**Via e-service and email**

Re: Cause No. 141-307474-19; Victor Mignogna, Plaintiff v. Funimation Productions, LLC, Jamie Marchi, Monica Rial, and Ronald Toye, Defendants, 141st District Court, Tarrant County, Texas

Casey:

Mr. Mignogna will not be available to be deposed on May 30, 2019 so we will need to re-schedule.

To avoid inconveniencing you and your clients, we're willing to enter into a Rule 11 agreement to file an agreed order extending your TCPA filing deadline by the number of days between May 30 and the date he will be available. I will advise you later as to his availability in June (subject to our pending motions of course).

And since you and your clients will now be available on May 30, we will schedule the hearing on that date.

Please feel free to call me if you want to discuss this further.

With Warmest Regards,

*Ty Beard*

Ty Beard

**EXHIBIT E**

**TYLER OFFICE:**  
100 INDEPENDENCE PLACE  
SUITE 101  
TYLER, TEXAS 75703  
O: 903.509.4900

**MARSHALL OFFICE:**  
115 NORTH WELLINGTON  
SUITE 102  
MARSHALL, TEXAS 75670  
O: 903.509.4900

**FRISCO OFFICE:**  
8000 WARREN PARKWAY  
SUITE 202  
FRISCO, TEXAS 75034  
O: 903.509.4900

**WWW.BEARDANDHARRIS.COM**

EXHIBIT F

**No. DC-11-13742-D**

SINTIA HUTCHINSON,

Plaintiff,

V.

KERRICK DARRELL GREER and  
WELLS FARGO BANK, N.A.,

Defendants.

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

95TH JUDICIAL DISTRICT

**ORDER**

Before the Court is the Plaintiff's Motion to Quash and for Protective Relief, to which Defendant Wells Fargo has responded. The hearing on the motion, currently set for November 29, 2012, is canceled for the reasons set forth below.

The current dispute largely centers around "Who goes first?" in the taking of depositions. Plaintiff Hutchinson made the first formal requests to depose Defendant Greer, who allegedly sexually assaulted her. Defendant Wells Fargo, insisting that Hutchinson's case is a fabrication "to obtain financial gain from Wells Fargo," claims that it has the right to depose Hutchinson first, and, as a result, it is refusing to tender Greer, its employee, until Hutchinson's deposition is complete.

Wells Fargo argues that because it has determined that the plaintiff's case is baseless, allowing Greer's deposition to go first will provide the plaintiff "an unfair advantage" by giving her the opportunity "to shape and mold her testimony" based upon what Greer says in his deposition testimony. "Plaintiff's sole purpose for wanting Greer's deposition . . . is to hear Greer's version of the story [in order] to craft her own version of the facts. . . . [and]

Ms. Hutchinson should be required to [first] give sworn testimony to support all the salacious claims alleged against Defendant[s] Greer and Wells Fargo.”<sup>1</sup>

Undisputed language from e-mail correspondence from Wells Fargo’s counsel to Hutchinson’s lawyers, set forth in the plaintiff’s motion, most accurately capsulizes the dispute:

The timing of the depositions is a flash point - Ms. Hutchinson filed her case and must be made to answer questions concerning her allegations based upon her personal knowledge of the events upon which she based her pleading, not subsequently acquired knowledge from Mr. Greer’s response. We are firm on that point.

The Court rejects Wells Fargo’s position. Having first sought Greer’s deposition, Hutchinson is entitled to take Greer’s deposition first. The Texas Rules of Civil Procedure specify no procedure by which a party somehow acquires a right to depose first because that party disbelieves its opponent’s claims and may, as a result, refuse to tender its witness for deposition, even though that witnesses’s deposition has been sought first. With only rare exception, discovery must proceed on a first-come, first-served basis.

It takes little imagination to see where Wells Fargo’s rule would lead. Arguably, it would likewise be proper in this case for Wells Fargo to refuse to respond to disclosure

---

<sup>1</sup> The details of this dispute are well known to the parties and are not recounted here. As matters currently stand, plaintiff’s counsel had most recently proposed December 10 and 13, 2012, as dates on which to take Greer’s and Hutchinson’s depositions, respectively. In a game of leap frog, Wells Fargo then formally noticed Hutchinson’s deposition for December 10, 2012—the proposed date for *Greer*’s deposition—and then claimed unavailability on December 13. Wells Fargo has also demanded that Hutchinson’s deposition be taken at the office of its counsel, which, absent agreement to the contrary, is a clear breach of custom in the Dallas area.

requests, interrogatories and production requests before plaintiff responded to equivalent discovery, even though plaintiff propounded her discovery requests first. Granted, while there are no fixed responsive deadlines for depositions as there are for the other discovery devices cited, such a rule as Wells Fargo urges would nevertheless lead to unacceptable gamesmanship of the very sort engaged in here.

Furthermore, if there were any fixed rule as to the order of depositions, *and there is not*, our traditional rules of procedure would clearly give deference to the party bearing the burden of proof on the case as a whole, such that a plaintiff would have the right to “call” the first depositions.

This case is simple. The plaintiff asked first. This Court will not allow gamesmanship to upend that request. And certainly, the Court will not pre-try the merits of the case to determine when a party is entitled to use our discovery rules.

Accordingly, the Plaintiff’s Motion to Quash and for Protective Order is **GRANTED**, and it is further **ORDERED** as follows:

1. The defendants shall tender Defendant Greer for deposition during the month of December 2012. In the event the date of December 10 remains available, Defendant Greer shall be tendered on that date;
2. Within five days of the completion of the Greer deposition, plaintiff’s counsel shall tender the plaintiff for deposition at the



offices of plaintiff's counsel, or at such location as shall be agreed upon among counsel for the parties;

3. Defendant Wells Fargo's request for fees and costs associated with the response to plaintiff's motion is **DENIED**.

**IT IS SO ORDERED.**

Signed this 27<sup>th</sup> day of November, 2012.


  
\_\_\_\_\_  
**KEN MOLBERG**  
**Judge, 95TH District Court**

EXHIBIT G

# Nick and Ty: the Vic Mignogna Brief

Michael Gutierrez (@michaelgutierrez) /bleedingfool.com/at/nick-and-ty-the-vic-mignogna-brief/ Mar 25, 2019



([https://bleedingfool.com/wp-content/uploads/2019/03/M9qmC7UROXbB\\_Kknysjd\\_xwKxGDGfsPr9ZEFqy-vQcLYGCjxMIHiD0TRoHN2xBB.png](https://bleedingfool.com/wp-content/uploads/2019/03/M9qmC7UROXbB_Kknysjd_xwKxGDGfsPr9ZEFqy-vQcLYGCjxMIHiD0TRoHN2xBB.png))

Over the past weeks, there has been an increase in the attention being placed on the world of Anime. Dubbed AnimeGate, this new movement shares several characteristics with its sister movements: ComicsGate, and GamerGate. Like previous movements, this one also aims to strike back at the SJW infestation that has insidiously invaded all fandoms across the world. Prominent in this movement is the existence of a legal battleground as its starting point, one that is loosely organized by large profile YouTubers like That Umbrella Guy ([https://www.youtube.com/channel/UCMAwi5fm2yOSEeKd\\_Qv0Z2Q](https://www.youtube.com/channel/UCMAwi5fm2yOSEeKd_Qv0Z2Q)), Yellow Flash (<https://www.youtube.com/channel/UCMrpRnyBJhgVB3rm0K4P5w>), and Nick Rekieta (<https://www.youtube.com/channel/UCbkjX3E0lhuUfPzL0FjSPaw>). But the overwhelmingly characteristic of this movement is an incidental insight into how “normies” react to the initial exposure of the SJW tactics almost in real time.

## FearTheBeard with Rekieta Law and Ty Beard on Vic Migno...



Nick introduces Ty Beard, and the SJW world comes to a complete halt.

Mr. Nick Rekieta has long hosted livestreams on YouTube with the aim of analyzing ongoing legal cases, offering both explanations of the ongoing litigation and possible legal strategies that could be used by the involved attorneys. These legal strategies are largely conjecture by Nick, however time and time again he has been proven correct in his legal opinions as those cases reach their conclusions. It was in this capacity that Nick was exposed to the ongoing drama that Vic Mignogna has been facing on his own, and Nick's legal calling prompted him to take action. After organizing Vic's GoFundMe, and managing a \$100,000 goal (which was reached within 15 days), Nick became even more exposed to those terrorist tactics that the SJWs employ to destroy their enemies. But Nick would not be the only "normie" that would learn these tactics first hand, Vic's attorneys Beard, Harris, Bullock, and Hughes would also be exposed.

## Two For One Special On Ethics Complaints - KamehaCon F...



Watch as Ty offers some much needed support to Nick after ethics complaints received.

Those of us that have dealt with SJWs, both directly and indirectly, are used to seeing their handiwork and tactics in brazen display, but that was not the case with Mr. Ty Beard, an attorney working out of Tyler, Texas. His online presence was non-existent by his own admission prior to taking on this case. The Internet can be a harsh, cruel, and unforgiving place for people like that; for a second I feared for Mr. Beard's sanity. When I learned that the "Autistic Force of the Internet" located within KiwiFarms was openly scouring the Internet for information to provide him, my fears increased for a second. For the first time ever, I witnessed a true act of chivalry within the barren landscape of the internet: KiwiFarm users actively warned Mr. Beard of what areas to actively avoid within the site. Ty has made three appearances in Nick's livestreams, each of those appearances has been drastically different from one another. Viewers can see the disgust that this "normie" is experiencing as he is exposed to this form of terror that is SJWs.



Ty appeared to be surprised at how effective the SJW tactics have proven so far. His commentary on how these parasites have been able to influence and affect people's lives over perceived crimes is a great reflection on the public's reactions to it. Ty dismissed the comparison of SJW tactics to the Salem Witch Trials by saying that at least those accused of witchcraft in such an arcane time received a trial in front of a judge. He also remarked at how SJWs drove such an intense amount of pressure on business owners that they would inevitably succumb to the pressure in order to receive some peace. This further echoes previous complaints made by Richard Meyer and his sabotaged business relations, as well as the multitude of attacks leveled against Alterna Comics.

## #FEARTHEBEARD on the Difference Between Good Decisio...



Ty Beard shares his experiences dealing with SJW tactics.

Ty brought an outsider's perspective to this ongoing SJW infection, and accurately identified not just the problem, but the solutions needed to successfully combat this invasion. Both Nick and Ty reached out to the fans and asked them to support a convention currently undergoing their own SJW swarm, along with other suspected criminal activities. This convention, strengthened by the overwhelming fan support, took a stand against the SJW tactics and drove the first wound on their narrative.

I have never even heard of this cosplayer. But they are fucking cancelled. Slut shaming, calling people autistic bc she doesn't like/agree with them, calling men soy/c\*cks which is sexist toxic masculinity bullshit. So this cosplayer

Uses slurs  
Body shames  
Slut shames

9h Like Reply

**Dominique Skye**  
Jessica Guida wait is it??? Is she really a cop? HMMMMMMMMMMMMMMMM

9h Like Reply

9h Like Reply

**Jessika Guida**  
She made this so easy!

social media administrator at Bakersfield Comic-Con  
social media administrator at Friends of Bak-Anime  
Substitute teacher at Delano Union School District  
Studied Liberal Studies at California State University, Bakersfield

Especially because she cosplays characters who fight against this toxic behavior And also i was shocked her ig had that many followers Maybe she been hiding this shit all this time Whelp she is cancelled for

**GhostShell**  
@GhostShellZen

EXPOSED: #kickvic cosplayers @Dominique\_Skye, @PepperMonster, @JessiePridemore & more are part of a FB group that doxx people from #IStandWithVic. @KRONICKaren



tells me that the posts with her info are still up, has received threats since then. Can the community help protect her?

♡ 566 4:59 PM - Mar 24, 2019

💬 365 people are talking about this



Meanwhile, Nick's professional career has taken some small attacks from the same parasites. As attorneys, Nick and Ty are both held to high standards of behavior in their practices by distinctly different governing professional ethics boards. Nick has received two terrorist attacks in the form of "ethics complaints" from separate SJWs. Risking both financial and criminal consequences, the terrorists have tried to bully Nick into silence with their ill-conceived actions.



But it would be Ty's outsider wisdom that would continue to add a level of calm into the situation. He remarked at how social media has become such a powerful weapon thanks to the SJWs, and that it should be a weapon to be used against them. "Crowdfunding is a game changer," Ty remarked, adding that this fan supported tool would allow people like Vic to seek justice for the crimes committed against them. Due to the ever increasing list of offenders, from busybodies to convention coordinators, Nick has changed the GoFundMe



(<https://www.gofundme.com/vic-kicks-back>)’s overall goals. As Nick has said in multiple occasions, justice moves at a deliberate pace until it becomes an avalanche. With more SJWs willing to throw themselves as sacrificial lambs, this avalanche will surely be fruitful.



SJWs have controlled the narrative long enough. Their lies have twisted and turned joyful pastimes into another chore. “Bad people ruin good things,” fandoms are severed and destroyed left and right. Large companies are dying, nostalgic memories are being poisoned, childless weirdos are being trusted with providing healthy entertainment for the future generations. We have carried our share of the blame for this infestation for long enough. Vic represents our brothers, our sons, our fathers, and our friends; he needs us and we will be there for him. For all of them like him that have witnessed as their lives are destroyed by people who are little more than oxygen wasters. This situation will hopefully lay out a blueprint that can be used in the future as more fandoms are born from the ashes of those that have succumbed to the SJW plague.

=====

If you can contribute, you will find the link to Vic’s GoFundMe below. PAnd please support Nick’s channel by subscribing, as his voice (and drunken rants) continue to be both informative and entertaining. He just crossed the 50k subscriber count, but his passionate coverage on multiple legal cases will surely transform into more quality entertainment. You will find the link to his channel below.

Nick's channel: <https://www.youtube.com/channel/UCbkjX3E0IhuUfPzL0FjSPaw>  
(<https://www.youtube.com/channel/UCbkjX3E0IhuUfPzL0FjSPaw>)

Vic's GoFundMe: <https://www.gofundme.com/vic-kicks-back> (<https://www.gofundme.com/vic-kicks-back>)



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## MICHAEL GUTIERREZ ([HTTPS://BLEEDINGFOOL.COM/AUTHOR/RENEPROSPERO/](https://bleedingfool.com/author/reneprospero/))

I review comics and other pop culture on their own merit. Follow me on Twitter @Call2Mike (<https://www.twitter.com/Call2Mike>). Please contact Bleeding Fool if you are a creator and are interested in having me review your work.

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OR SIGN UP WITH DISQUS ?

Name



**Alexander Sedge** • 2 months ago

I've been hearing people warning me about Vic since the early 2000s. The recent allegations were thus not a surprise to me. Does that make me an oxygen-waster?

Or, wait, am I allowed to call myself an oxygen-waster like the article does, or does that violate the name-calling policy

^ | v • Reply • Share ›

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1 comment • 8 days ago



**Doug "DiRT" Turner** — Well, there's also this problem where you release a comic book in an English-speaking nation and the characters

#### Freshman Fart: Alexandria Ocasio-Cortez's Trash Comic

1 comment • 6 hours ago

#### Marvel Comics Adopts Political Retcon from MCU

4 comments • 5 days ago



**David Fullam** — Rest in Peace Marvel. Was fun while it lasted.

#### Batman & Catwoman Continues the Ongoing Bat+Cat Romance

1 comment • 10 hours ago

EXHIBIT H

Link: <https://www.youtube.com/channel/UCbkjX3E0IhuUfPzL0FjSPaw>

Rekieta Law - YouTube

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61,815 subscribers

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Rekieta Law

19,232 views • 1 year ago

Who is Nick Rekieta of Rekieta Law? You're on his YouTube Channel...

He's a lawyer who lawspains legal topics to the internet, fueled by whiskey and rage.

Find him on social media here:

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PLAY ALL

Patriotism and Anime

True's CONTRACT

Cultural Nopemation

Lady Rackets Interview

Minor Updates

True gets Fazed out

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EXHIBIT I

## Image of Rekieta Law Selling “Fear the Beard Merchadise”

Monica Rial KamehaCon + X

https://www.youtube.com/watch?v=vYoNy\_qm0RU

Apps Bing Google Yahoo Suggested Sites Imported From Manage Art and Cultural He... Google Workshare

YouTube Search

### LAWSPAINING @NICKREKIETA

Monica Rial KamehaCon Announcement and Vic Lawsuit Foreshadowing

64,039 views 3.4K 20 SHARE SAVE






**Rekieta Law**  
Published on Apr 3, 2019

Monica Rial has announced her alternative signing event for KamehaCon. How sued is she? Not very.

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722 Comments SORT BY

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**Michael Pisciarino** 1 week ago (edited)  
1:04 Monica adds distance  
3:49 Kameha Con possibly losing business from this move  
5:06 When do we see a lawsuit? 6:26

373 20 REPLY  
View 23 replies

**dookie\_12** 1 week ago  
WTF this video isn't even 24 hours long. Unsubbed

