

September 4, 2019

VIA HAND DELIVERY

Hon. Judge John P. Chupp
Tom Vandergriff Civil Courts Building
3rd Floor
100 North Calhoun Street
Fort Worth, Texas, 76196

FILED
TARRANT COUNTY
9/4/2019 4:40 PM
THOMAS A. WILDER
DISTRICT CLERK

Re: Cause No. 141-307474-19; *Mignogna v. Funimation, et al.* currently pending
before the 141st District Court of Tarrant County, Texas.

Dear Judge Chupp:

I write on behalf of Monica Rial and Ron Toye, to provide you courtesy copies of the following, in preparation for the Motions to Dismiss pursuant to the Texas Citizens Participation Act ("TCPA") that are set for hearing on September 6, 2019.¹ We provide you four (4) binders along with a thumb drive with the same relevant files, segregated by named file folder.

Black Binder (Plaintiff's Relevant Pleadings and Motions)

- Tab 1: Plaintiff's First Amended Petition (filed July 12, 2019)
- Tab 1A: Plaintiff's Proposed Second Amended Petition (filed September 2, 2019) (without exhibits)
- Tab 2: Plaintiff's Motion for Leave to File Late Response to Defendants' TCPA Motions to Dismiss Due to Technical Issue (filed August 31, 2019)
- Tab 2A: Monica Rial, Ronald Toye, and Jamie Marchi's Joint Response/Cross-Motion to Strike (1) Plaintiff's Response to the TCPA Motions to Dismiss, (2) Plaintiff's Second Amended Petition, and (3) to Deny Plaintiff's Motion for Leave to File Late Response to Defendants' TCPA Motions to Dismiss Due to Technical Issues (filed September 3, 2019) (without exhibits)²
- Tab 2B: Funimation Production, LLC's Joinder in Joint Response/Cross-Motion to Strike (1) Plaintiff's Response to the TCPA Motions to Dismiss, (2) Plaintiff's Second Amended Petition, and (3) to Deny Plaintiff's Motion for Leave to File Late

¹ We have provided a Sharefile link with the same information to Plaintiff's counsel.

² Given the gravity of the issues raised herein, Defendants request this issue be dealt with first at the hearing on September 6, 2019.

	Response to Defendants' TCPA Motions to Dismiss Due to Technical Issues (filed September 3, 2019)
Tab 3:	Plaintiff's Motion to Strike or Disregard Defendant's Late Filings (filed August 7, 2019)
Tab 3A:	Monica Rial and Ronald Toye's Response to Plaintiff's Motion to Strike or Disregard Defendants' Late Filings (filed August 29, 2019)
Tab 3B:	Funimation Production, LLC's Response to Plaintiff's Motion to Strike or Disregard Defendants' Late Filings (filed August 29, 2019)
Tab 4:	Plaintiff's Response to Defendants' TCPA Motions to Dismiss (without exhibits) ³
Tab 4A:	Defendants' Omnibus Objections to Plaintiff's TCPA Evidence. (filed September 3, 2019)
Tab 5:	Plaintiff's Objections to and Motion to Strike Evidence Offered in Support of Defendants' Motions to Dismiss and Defendants' Supplemental Evidence Filed in Support of Defendants' TCPA Motions to Dismiss and Supplemental (filed August 31, 2019)
Tab 5A	Monica Rial and Ronald Toye's Response to Plaintiff's Objections to and Motion to Strike Evidence Offered in Support of Defendants' Motions to Dismiss and Defendants' Supplemental Evidence Filed in Support of Defendants' TCPA Motions to Dismiss and Supplemental
Tab 5B	Funimation Production, LLC's Response to Plaintiff's Objections to and Motion to Strike Evidence Offered in Support of Defendant Funimation's Motion to Dismiss
Tab 6	Defendants' Proposed Corresponding Orders (in Word) for Tabs 2A, 3A-B, 4A, 5A-B

White Binder (Jamie Marchi TCPA Motion to Dismiss)

Tab 1:	Jamie Marchi's Motion to Dismiss (without exhibits) (filed July 19, 2019)
Tab 2:	Jamie Marchi's Reply in Support of her Motion to Dismiss (filed September 2, 2019)
Tab 3:	Proposed Order

³ The thumb drive contains the complete copy of all motions and pleadings referenced herein, along with Exhibits.


Blue Binder (Funimation Productions, LLC TCPA Motion to Dismiss)

- Tab 1: Funimation Production LLC's Motion to Dismiss (without exhibits)
(filed July 1, 2019)
- Tab 2: Funimation Production, LLC's Supplemental Brief in Support of its TCPA
Motion (filed July 29, 2019) (without exhibits)
- Tab 3: Funimation Production, LLC's Supplemental Evidence in Support of its TCPA
Motion to Dismiss (filed August 6, 2019) (without exhibits)
- Tab 4: Funimation Production, LLC's Reply in Support of its Motion to Dismiss
(filed September 3, 2019)
- Tab 5: Proposed Order (in Word)

Green Binder (Monica Rial and Ron Tove TCPA Motion to Dismiss)

- Tab 1: Monica Rial and Ron Toye's Motion to Dismiss Pursuant to the Texas Citizens
Participation Act (without exhibits) (filed July 19, 2019)
- Tab 2: Monica Rial and Ronald Toye's Supplement to Motion to Dismiss
(filed July 30, 2019) (without exhibits)
- Tab 3: Monica Rial and Ronald Toye's Reply in Support of Their Motion to Dismiss
(filed September 3, 2019)
- Tab 4: Proposed Order (in Word)

Regards,



J. Sean Lemoine

Attachments (four binders)

cc: All counsel of record *via* ECF (without enclosures)