

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address <b>BRIAN MARTIN</b>  Pro Se  941 CIMARRON LANE, CA 92879  840-207-1860  xbrianmartinx@gmail.com  <input checked="" type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION</b>	
In re: <b>BRIAN DENNIS MARTIN</b>  <hr/> DAVID TYLER MOSS; FIDELISSIMUS, LLC  <p style="text-align: right;">Plaintiffs</p> v.  BRIAN DENNIS MARTIN  <p style="text-align: right;">Defendant</p> <p style="text-align: right;">Debtor(s).</p>	CASE NO.: 6:25-bk-10944 / 6-25-ap-1055 CHAPTER: 7  <b>NOTICE OF MOTION FOR:</b> MOTION FOR PROTECTIVE ORDER FILED BY DEFENDANT  <i>(Specify name of Motion)</i>  DATE: 01/13/2025 TIME: 2:00 pm COURTROOM: 303 PLACE: 3420 Twelfth Avenue Riverside, CA 92501

1. TO (specify name): PLAINTIFFS AND ALL INTERESTED PARTIES
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 12/19/2025

PRO SE DEFENDANT  
Printed name of law firm

  
\_\_\_\_\_  
Signature

PRO SE BRIAN MARTIN  
Printed name of attorney

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
941 Cimarron Lane, Corona, CA 92879

A true and correct copy of the foregoing document entitled (*specify*): \_\_\_\_\_  
DEFENDANT'S MOTION FOR PROTECTIVE ORDER - December 19, 2025

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 12/19/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforuptcy.com  
trustee.bui@shulmanbastian.com, C115@ecfbis.com  
marksrosen@aol.com, pattielegalasst@aol.com, ustpregion16.rs.eft@usdoj.gov, xbrianmartinx@gmail.com

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 12/19/2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Magdalena Reyes Bordeaux  
United States Bankruptcy Court  
Central District of California  
3420 Twelfth Street, Suite 365 / Courtroom 303  
Riverside. CA 92501-3819

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/19/2025 Holly Martin  
*Date Printed Name*

  
*Signature*

1 IN THE UNITED STATES BANKRUPTCY COURT FOR THE CENTRAL DISTRICT OF  
2 CALIFORNIA RIVERSIDE DIVISION

3  
4 **In Re BRIAN DENNIS MARTIN**

Chapter 7 Case No. 6:25-bk-10944-MH  
Adversary No.6:25-ap-01055-RB

5  
6 **DAVID TYLER MOSS and**  
7 **FIDELISSIMUS, LLC,**

**DEFENDANT’S MOTION FOR  
PROTECTIVE ORDER  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 26(c) AND  
FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 7026**

8 **Plaintiffs,**

9 **vs.**

10 **BRIAN DENNIS MARTIN,**

Date: January 13, 2026

11 **Defendant.**

Time: 2:00PM

Courtroom: 303

PLACE: 3420 12th Ave., Riverside CA

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15 **Motion for Protective Order**

16 **TO THE HONORABLE MAGDALENA BORDEAUX, JUDGE OF THE UNITED STATES**  
17 **BANKRUPTCY COURT.**

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20 **I. INTRODUCTION AND RELIEF REQUESTED**

21 Defendant BRIAN DENNIS MARTIN (“Defendant”), appearing pro se, hereby moves this Court  
22 pursuant to Federal Rule of Civil Procedure 26(c), made applicable to this adversary proceeding by  
23 Federal Rule of Bankruptcy Procedure 7026, for a protective order regarding discovery requests  
24 served by Plaintiff DAVID TYLER MOSS and FIDELISSIMUS, LLC (“Plaintiff”) on December  
25 19, 2025. Defendant seeks the following relief:  
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- 1. A complete prohibition on requests for documents and information that have already been produced or addressed in prior litigation between the parties;
- 2. A confidentiality order designating certain employment-related information as “Attorneys’ Eyes Only” with appropriate restrictions on disclosure;
- 3. Judicial notice of the findings and rulings from prior litigation involving the same parties and issues;
- 4. Limitations on the scope of discovery to reduce undue burden and expense;
- 5. A requirement that any permitted discovery be responded to within 30 days of the Court’s order;
- 6. A court-ordered meet and confer session to narrow the disputed issues; and
- 7. Provisions for contempt proceedings and monetary sanctions for violations of any protective order issued.

This Motion is based on the following Memorandum of Points and Authorities, the Declaration of BRIAN DENNIS MARTIN filed concurrently herewith, all pleadings and papers on file in this action, and such other evidence and argument as may be presented at or before the hearing on this Motion.

**II. MEMORANDUM OF POINTS AND AUTHORITIES**

**A. Statement of Facts**

- 1. Defendant is a named defendant in this adversary proceeding filed by Plaintiff in connection with the above-captioned bankruptcy case.
- 2. On November 18, 2025, Plaintiff served Defendant with written discovery requests, including Requests for Production of Documents, Interrogatories, and Requests for Admission.

1 Responses to these discovery requests were submitted on December 13, 2025.

2  
3 3. The discovery requests at issue seek documents and information that:

- 4 a. Have already been produced or addressed in prior litigation between the parties;
- 5 b. Relate to Defendant’s employment as a content creator and business owner with  
6 YouTube/Google;
- 7 c. Concern third-party documents and information not in Defendant’s possession,  
8 custody, or control; and
- 9 d. Where previously the subject of litigation in multiple cases, including:  
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- 11
- 12 i. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al.; DC-20-09893
- 13 ii. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al.; 05-22-00439-CV
- 14 iii. Kevin Martin & Force Media LLC v. JP Morgan Chase et al. Case No. CVRI2402841  
15 (Riverside).  
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17

18 4. Defendant is employed as a content creator and business owner whose work is with  
19 YouTube/Google. The disclosure of certain information requested in discovery could  
20 potentially result in the termination of Defendant’s YouTube channels due to what is  
21 commonly referred to as “drama” in the content creator community, thereby threatening  
22 Defendant’s livelihood. Defendant’s wife Holly Bone lost her main source of income, career,  
23 and job business due to the same tactics by the Plaintiffs to construct enough drama and  
24 terminate valuable YouTube channel businesses. Plaintiffs have extorted Kevin Martin the  
25 same way they did toward Holly Bone’s YouTube channels and revenue by falsely accusing  
26 Kevin Martin of being a straw man when video recording made by Plaintiff Brandon Keating  
27 proves Plaintiffs were aware of the facts, ignored the facts, and constructed lies against the  
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1 facts to illegally obtain property and assets they were not entitled to. The recording was posted  
2 on Plaintiffs YouTube channel (<https://www.youtube.com/@brianmartinlawsuitarchive>)  
3 (<https://www.youtube.com/watch?v=DMEXO53hfdc>) to embarrass and intimidate. Which  
4 shows the character of Plaintiffs and further need for this protective order. [EXHIBIT A]  
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6 5. In the parties' most recent Joint Status Report filed with this Court, [EXHIBIT B] Plaintiff  
7 threatened motions to compel and stated defendant is going to jail while creating a fake AI  
8 video of defendant saying defendant did bankruptcy fraud [EXHIBIT C] prior to even serving  
9 the discovery requests at issue, demonstrating a pattern of aggressive discovery tactics. In  
10 previous cases in Dallas Texas, such threats have been made by Plaintiffs and their counsel  
11 despite adequate discovery responses motions were filed at an attempt to jail defendants.  
12 Plaintiffs and their counsel demonstrate abuse in multiple cases including emails to defendant  
13 calling defendant a coward. Plaintiffs also have used witnesses that lie under oath several  
14 times to further their scam. Defendant admits losing temper and having autistic breakdowns  
15 and making threats back toward the abusive Plaintiffs but defendant should not be treated like  
16 this especially when the original fraud case of 2016 was not defendants doing and defendant  
17 had no way to properly defend a claim that should have stayed between Marko Princip and  
18 Plaintiffs.  
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22 6. Defendant seeks protection from every document request served by Plaintiff on the grounds  
23 that they are duplicative, cumulative, unduly burdensome, and seek information already in  
24 Plaintiff's possession or that has been previously addressed in prior litigation. Overuse of the  
25 term 'alter-ego' is constructed by Plaintiffs to deceive this court the rights defendant has as an  
26 individual who's work is in a dynamic ever-changing atmosphere such as YouTube and any  
27 social media online. There can never be a legal conclusion in a dynamic workplace such as  
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1 being a content creator on YouTube when there are multiple jobs available on YouTube such  
2 as creator, manager, channel creator, social media manager, editor, and moderator. Ownership  
3 does not get placed on anyone who decides to take on a job on the YouTube website such as  
4 management. You can be managers and have 0% control and ownership of someone else's  
5 channel. Plaintiffs failed to have evidence for these claims in DC-20-09893.  
6

7 **B. Legal Standard for Protective Orders**

8 Federal Rule of Civil Procedure 26(c), made applicable to this adversary proceeding by Federal  
9 Rule of Bankruptcy Procedure 7026, provides that the Court may, for good cause shown, issue a  
10 protective order to protect a party from “annoyance, embarrassment, oppression, or undue burden  
11 or expense.” The Court may forbid the disclosure or discovery, specify terms for the disclosure or  
12 discovery, prescribe a discovery method other than the one selected by the party seeking discovery,  
13 forbid inquiry into certain matters, limit the scope of disclosure or discovery, require that a trade  
14 secret or other confidential information not be revealed or be revealed only in a specified way, and  
15 impose other appropriate restrictions.  
16

17 Federal Rule of Civil Procedure 26(b)(2)(C) further provides that the Court must limit the  
18 frequency or extent of discovery if it determines that:  
19

- 20 1. The discovery sought is unreasonably cumulative or duplicative, or can be obtained from  
21 some other source that is more convenient, less burdensome, or less expensive;
- 22 2. The party seeking discovery has had ample opportunity to obtain the information by  
23 discovery in the action; or
- 24 3. The proposed discovery is outside the permissible scope of discovery.  
25

26 Additionally, 11 U.S.C. § 105(a) grants the bankruptcy court broad equitable powers to “issue any  
27 order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”  
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**C. Good Cause Exists for the Issuance of a Protective Order**

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The Discovery Requests Seek Information Already in Plaintiff’s Possession

Plaintiff’s discovery requests seek documents and information that Plaintiff already possesses from prior litigation between the parties. Requiring Defendant to reproduce these materials would impose an unnecessary and duplicative burden on Defendant. Federal Rule of Civil Procedure 26(b)(2)(C)(i) specifically provides that the Court must limit discovery where it is “unreasonably cumulative or duplicative.”

1. The discovery requests at issue seek information that was extensively litigated in four prior cases between the parties or related entities. Plaintiff has already had ample opportunity to obtain the requested information through discovery in those actions, and requiring Defendant to respond again to the same or substantially similar requests constitutes harassment and imposes an undue burden.
2. The Discovery Requests Seek Information That Could Threaten Defendant’s Employment
3. Certain discovery requests seek information related to Defendant’s employment as a content creator and business owner with YouTube/Google. The disclosure of this information could potentially result in the termination of Defendant’s YouTube channels due to what is commonly referred to as “drama” in the content creator community.
4. YouTube/Google has specific policies regarding content creator conduct, and the public disclosure of certain information could violate these policies or create controversy that could lead to demonetization or channel termination. This would directly threaten Defendant’s livelihood and business interests.
5. A protective order designating such information as “Attorneys’ Eyes Only” would appropriately balance Plaintiff’s purported need for discovery with Defendant’s legitimate

1 interest in protecting his employment and business relationships.

2 6. The Discovery Requests Seek Third-Party Documents Not in Defendant’s Possession

3  
4 7. Several of Plaintiff’s discovery requests seek documents and information belonging to third  
5 parties that are not in Defendant’s possession, custody, or control. Discovery rules generally  
6 only require a party to produce documents that are within that party’s possession, custody,  
7 or control. Requiring Defendant to attempt to obtain documents from third parties would  
8 impose an undue burden and expense on Defendant. The Discovery Requests Seek to

9 Relitigate Issues Already Decided

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11 8. Plaintiff’s Requests for Admission seek admissions on issues that have already been  
12 decided in prior litigation between the parties. The doctrine of issue preclusion (collateral  
13 estoppel) prevents parties from relitigating issues that have already been decided in a prior  
14 proceeding. Requiring Defendant to respond to these requests would be duplicative and  
15 wasteful of both the parties’ and the Court’s resources.

16  
17 The Court should take judicial notice of the findings and rulings from the prior litigation between  
18 the parties and preclude discovery on issues that have already been decided.

19 **D. Meet and Confer Certification**

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21 Pursuant to Federal Rule of Civil Procedure 26(c) and this Court’s Local Rules, Defendant certifies  
22 that he has in good faith attempted to confer with Plaintiff’s counsel, MARK S. ROSEN, in an  
23 effort to resolve the dispute without court action. Despite these efforts, the parties have been unable  
24 to reach a resolution. Plaintiff filed Motion to modify discovery period and motions to compel  
25 without conferring with any party or person.

26  
27 Defendant requests that the Court order a formal meet and confer session between the parties to  
28 narrow the disputed issues before ruling on this Motion. This would provide an opportunity for the

1 parties to potentially resolve some or all of the discovery disputes without further Court  
2 intervention.

3 **III. PROPOSED PROTECTIVE ORDER**

4 Defendant respectfully requests that the Court enter a protective order containing the following  
5 provisions:  
6

7 1. **Prohibition on Duplicative Discovery:** Plaintiff shall be prohibited from seeking documents  
8 or information that:

- 9 a. Have already been produced in prior litigation between the parties;
- 10 a. Relate to issues that have already been decided in prior litigation between the parties;
- 11 or
- 12 a. Are otherwise in Plaintiff’s possession, custody, or control.

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14 2. **Confidentiality Designations:**

- 15 a. Defendant may designate documents and information related to his employment with
- 16 YouTube/Google as “ATTORNEYS’ EYES ONLY.”
- 17 a. Documents and information designated as “ATTORNEYS’ EYES ONLY” may be
- 18 disclosed only to:
  - 19 i. The Court and its personnel;
  - 20 i. Attorneys of record for the parties and their associated attorneys, paralegals,
  - 21 and staff;
  - 22 i. Court reporters and their staff, professional jury or trial consultants, and
  - 23 professional vendors to whom disclosure is reasonably necessary; and
  - 24 i. Any expert or consultant retained by a party for the purpose of this litigation,
  - 25 provided that such expert or consultant has first executed a Non-Disclosure
  - 26 Agreement in the form attached to the Protective Order.
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a. Documents and information designated as “ATTORNEYS’ EYES ONLY” shall not be disclosed to the parties themselves or to any third party not specifically authorized in this Protective Order.

3. **Judicial Notice: The Court shall take judicial notice of the findings and rulings from prior litigation between the parties, including:**

- a. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al., Case No. 05-22-00439-CV;
- a. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al., Case No. DC-20-09893;
- a. Martin & Force Media LLC v. JP Morgan Chase et al., Case No. 5:24-CV-01346 (federal); and
- a. Martin & Force Media LLC v. JP Morgan Chase et al., Case No. CVRI2402841 (Riverside).

4. **Limitations on Discovery Scope:** Any discovery permitted by the Court shall be limited in scope to:

- a. Information directly relevant to the claims and defenses in this adversary proceeding;
- a. Information not previously produced or addressed in prior litigation between the parties; and
- a. Information within Defendant’s possession, custody, or control.

5. **Time Limitations:** Defendant shall have thirty (30) days from the date of the Court’s order to respond to any discovery requests that the Court determines are properly discoverable.

6. **Meet and Confer Requirement:** The parties shall meet and confer within fourteen (14) days of the Court’s order on this Motion to attempt to narrow the disputed issues and reach agreement on the scope of permissible discovery.

7. **Document Handling and Return:**

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a. All confidential documents and information produced pursuant to this Protective Order shall be used solely for the purpose of this litigation and shall not be used for any other purpose.

a. Within sixty (60) days after the final termination of this litigation, including all appeals, all confidential documents and information, including all copies, shall be returned to the producing party or destroyed, with written certification of destruction provided to the producing party.

8. **Sanctions for Violations:** Any violation of the Protective Order shall be subject to:

- a. Contempt proceedings;
- a. Monetary sanctions in an amount to be determined by the Court;
- a. Such other and further relief as the Court deems just and proper.


**IV. CONCLUSION AND PRAYER FOR RELIEF**

For the foregoing reasons, Defendant BRIAN DENNIS MARTIN respectfully requests that the Court:

- 1. Grant this Motion for Protective Order;
- 2. Enter the Proposed Protective Order as set forth above;
- 3. Order the parties to meet and confer within fourteen (14) days to narrow the disputed issues;
- 4. Take judicial notice of the findings and rulings from prior litigation between the parties; and
- 5. Grant such other and further relief as the Court deems just and proper.

Respectfully Submitted,

DATED: December 19, 2025

  
By: Brian Martin in pro per

1 BRIAN MARTIN

2 Defendant, Pro Se

3 941 Cimarron Lane, Corona CA, 92879

4 840-207-1860

5 xbrianmartinx@gmail.com

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8 **DECLARATION OF BRIAN MARTIN**

9 I, BRIAN D. MARTIN, declare as follows:

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- 1. I am the Defendant in this adversary proceeding. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently thereto.
- 2. On November 18, 2025, I received discovery requests from Plaintiff, including Requests for Production of Documents, Interrogatories, and Requests for Admission. Responses to these discovery requests were submitted on December 13, 2025.
- 3. The discovery requests seek documents and information that have already been produced or addressed in prior litigation between the parties, including:
  - a. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al., Case No. 05-22-00439-CV;
  - a. Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al., Case No. DC-20-09893;
  - a. Martin & Force Media LLC v. JP Morgan Chase et al., Case No. 5:24-CV-01346 (federal); and
  - a. Martin & Force Media LLC v. JP Morgan Chase et al., Case No. CVRI2402841 (Riverside).

1 I am employed as a content creator and business owner whose work is with  
2 YouTube/Google. The disclosure of certain information requested in discovery could potentially  
3 result in the termination of my YouTube channels and other people’s channels due to what is  
4 commonly referred to as “drama” in the content creator community, thereby threatening my  
5 livelihood and the livelihood of others.

6 Several of Plaintiff’s discovery requests seek documents and information belonging to third  
7 parties that are not in my possession, custody, or control.

8 I have attempted in good faith to confer with Plaintiff’s counsel, MARK S. ROSEN, in an  
9 effort to resolve the discovery disputes without court action, but we have been unable to reach  
10 a resolution. He said he only wants the documents ‘For himself’ but he was advised to get  
11 them from his clients (Plaintiffs)

12 In the parties’ most recent Joint Status Report filed with this Court, Plaintiff threatened  
13 motions to compel prior to even serving the discovery requests at issue, demonstrating a  
14 pattern of aggressive discovery tactics.

15 At the meeting of creditors, normally they last 10-15 minutes, however these Plaintiffs  
16 harassed me and abused me for up to 2 hours and it was with two meetings each with false  
17 accusations from accusing me of purchasing mobile homes and owning a digital wallet they  
18 claimed they found in England. When the Trustee asked about the wallet the Plaintiff David  
19 Tyler Moss said they needed me and a password to access the wallet yet somehow Plaintiff  
20 David Tyler Moss stated five minutes later what was inside the wallet. After these accusations,  
21 the Plaintiffs forgot about it due to their understanding that they lied in the meeting of  
22 creditors.

23 This adversary proceeding should be narrowed down to determining discharge-ability to the  
24 2016 Judgment and the two collection cases that were filed in 2020 with one of them having a  
25 reverse and render opinion with a remand which asked the court to focus on proceedings

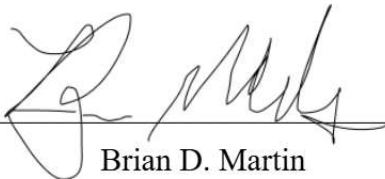
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having to do with fraudulent transfers which would be garnishment proceedings and not the lawsuit claims the plaintiffs were denied fully in the Dallas 5<sup>th</sup> Court of Appeals (Holly Bone-Martin and Brian Martin v. David Tyler Moss, et al., Case No. 05-22-00439-CV)  
The Trustee in this bankruptcy case went through two meetings of creditors with and asked questions that the trustee investigated and found no reason that defendant lied or was being fraudulent about anything. Trustee was educated about how YouTube works, how a job works when working in the YouTube platform, and how anyone can work on different roles within the sphere and not own channels they work for or manage as part of their job. Plaintiffs are using false allegations stating hidden assets when there simply is none and I stand by that fully and any further harassment about this won't be tolerated.

Brandon Keating is a member of Kiwifarms, and has actively harassed me and my family through this website which is a place for trolls and harassment that has lead to people's suicides. All members are abusive (EXHIBIT D)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on DECEMBER 19, 2025 at 941 Cimarron Lane, Corona CA, 92879

  
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Brian D. Martin

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**DECLARATION OF KEVIN MARTIN**

I, KEVIN MARTIN, declare as follows:

I am the defendants twin brother in this adversary proceeding. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently thereto.

On February of 2024, Brandon Keating who is the sole member of Plaintiff Fidelissimus, LLC, and I had a recorded photo conversation while I was heavily intoxicated. I did not have the capacity to mentally understand the conversation while under the influence as Brandon Keating was talking to me about my new business I was getting into when it came to my YouTube channel, CraftTastic. Watching the video recording while not under the influence of alcohol has lead me to believe that Brandon Keating used tactics to extort me out of my \$300,000 which was mine and in my control. In the conversation, I did try to settle the case so they leave my brother alone by offering my money to them. My money and my business is not controlled by my brother Brian. It is mine. Brandon Keating, knowing that I was drunk and knowing that I was new to the YouTube business, took advantage of me and used confusing language and even threatened his lawyers on me that if I don't give him the money that I will be sued. He said if I agree to give them money I will not be sued. I now realize this was extortion and when Brandon Keating's lawyers filed some stuff in Texas courts to freeze my bank accounts they effectively stole money from my Force Media, LLC chase account and even my personal account and I am not even a judgment debtor. I did not appear in those cases and I filed an appeal in the Dallas 5<sup>th</sup> Court of Appeals to get my money back and undo

1 everything they did to me including falsely calling me a Nominal Owner. I am not a nominal  
2 owner I am the owner. I have a right to open a YouTube channel and run my own business  
3 and hire anyone I wish it does not give authority to creditors over my business. Brandon  
4 Keating and David Tyler Moss have constantly harassed me and made false allegations toward  
5 me and Brandon Keating has even threatened that I am somehow breaking state and federal  
6 law and I will go to prison. Clearly if I want to create my own channels and business and run  
7 things my way I am legally allowed to without being harassed and controlled by creditors that  
8 I am not in debt to. The Plaintiffs harassed and attacked my business the same way they did to  
9 my Sister-In-Law Holly Bone in a previous case where they didn't even have evidence and  
10 lost their case cause of it and completely destroyed her life and her career.

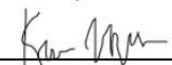
11 Brian Martin is not in a joint venture with me. I am a business man, and have created online  
12 businesses ever since the year 1999 starting with my own weather service and if I want to  
13 broaden my business prospects to other areas it is my right to do so but to view Brian Martin  
14 as a partner is not accurate as we signed a work for hire contract in February of 2023 where it  
15 states all he is is a work for hire artist and manager.

16 Due to Brandon Keating's constant harassment and false allegations in these matters I decided  
17 to sell my YouTube channel and brand to Brian's new business that he created and I am  
18 officially done with YouTube business seeing how the venture brought nothing but drama and  
19 legal matters I do not have the time for.

20 The appeal for my case in getting back my money that Brandon Keating extorted me under is  
21 (05-24-00943-CV)

22 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
23 is true and correct.

24 Executed on DECEMBER 19, 2025 at 941 Cimarron Lane, Corona CA, 92879

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\_\_\_\_\_  
Kevin Martin

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**CERTIFICATE OF SERVICE**


I hereby certify that a true and correct copy of the foregoing motion for Protective Order was served upon the following parties by the method indicated below on [12/19/2025]:

**MARK S. ROSEN**  
Attorney at Law  
27281 Las Ramblas, Ste. 200  
Mission Viejo, California 92691  
Tel: (714) 285-9838  
email: [MarkSRosen@aol.com](mailto:MarkSRosen@aol.com); [markrosen@markrosenlaw.com](mailto:markrosen@markrosenlaw.com)

- By hand delivery
- By United States mail, postage prepaid
- By overnight delivery service
- By facsimile transmission
- By electronic mail
- By electronic filing through the Court’s CM/ECF system

---

**Dated:** DECEMBER 19, [2025]

**BRIAN MARTIN**  
defendant in Pro Per  
By:   
BRIAN D. MARTIN

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# EXHIBIT A

<https://www.youtube.com/watch?v=DMEXO53hfdc>

(See Judge's USB Copy)

Protective\_Order\_EXHIBIT\_A\_625ap01055RB

## START TRANSCRIPT

00:00:01

it you know I'm I'm not going to try and get in between you and your brother but it seems like your brother threw your mom under the bus when he told her to ignore the court papers and that he would take care of it he's gonna he's going to do that right he's going to do the entire no no because mom called me and doing the [ \_\_ ] I mean he's throwing everyone on the bus the thing is he doesn't make honest money well well I the problem is is keemstar is doing his show right now so I don't

00:00:37

even know if he'd even answer me I I sent a message but I don't know all right here's what I want you to do okay can you me as a friend on Facebook then we can talk I want to see you face to face yeah what's that no you can do it I okay give me a second give me a second I'll find you all right bye I I still don't know what's happening bro I looked at the uh the Facebook and I I just can't find it the reason why is probably get out of sorry no worries yeah I just can't I can't done

00:01:41

I'm literally up what what's going on what happened I just don't care about what I'm I'm confused bro look I just don't care okay right I have I don't have man how do I do this I don't know Kevin privacy CER what am I doing it's prob settings probably maybe under settings there it is it's got be right there okay you found it us you probably are blocked oh see your block list okay right what are you what are you Brandon keing you're Brandon keing yes sir the well do this okay let's do this

00:02:46

if you go to my uh why don't you just go to my my Facebook page and call me there go to facebook.com okay hold on hold on let's let's see if what I'm saying is I'm going to give you the link to my profile and then you could call me yeah let's do it let's do it so it's facebook.com SLB don't me link it's facebook.com BG talks [ \_\_ ] it's BG talks like Brandon g k hey dude I told you something okay okay all me on your Facebook right now but what I'm

00:03:32

1 saying is I don't have your profile I don't know where your profile is so what I'm telling you  
2 Kevin is if you go to my profile you could call me and then I'll answer on Facebook I  
3 Love's trying to to me you know reason because just he everything I don't it's stupid [ \_\_ ]  
4 that he could have ever done he left his wife there with you just don't leave the house he left  
it did you did you I just I just sent you a link a a a message it's facebook.com bgk talks I  
don't give rat's [ \_\_ ] ass

00:04:26

5  
6 yours is what's your Facebook link I don't know what probably SC weatherman SC  
7 weatherman nope just look for Kevin Uh Kevin Mar I mean all you have to do is do that  
8 looks like guy was really [ \_\_ ] up stupid hair right but look I I hear you but when I search it  
9 it shows me a 100 Kevin Martins and none of them are you okay well should be more  
famous than that I don't even see your your your your uh text that we're talking let me do  
this I'm going to send you I'm going to send you the link to my profile on your

00:05:08

10  
11 Twitter okay no I don't care about Twitter I'm downstairs and I really don't give a [ \_\_ ]  
12 okay so what you're gonna do send me the link my email okay okay it's called the weather  
13 space all right hold on let me get into my my email yahoo.com okay and then I'm going to  
14 go compose the weather space the weather space kmkm gmail.com gmail.com direct l l all  
right so here's my Facebook link hold on all you have to do is just give me that it's probably  
gonna yeah yeah yeah

00:05:54

15 yeah I got you I just sent it oh look at Brian I told I emailed him I told to stop talking to you  
16 oh he's afraid you know why I don't know why he's afraid of me ain't [ \_\_ ] I can do to him I  
17 I don't give two shits to be honest I don't give a [ \_\_ ] about you you don't care about me  
18 Kevin Kevin no literally neutral okay I can be your guys judge if I wanted to okay I have I  
haven't done anything wrong of course not why would why would I think you did  
something wrong

00:06:31

19  
20 well you're going after him but you can try to go after me but the thing is there's uh you  
21 know I shouldn't have done this what my okay give me give me give me me I sent it to you  
22 it's in your email this is Facebook so I should hang up and answer when you call yeah oh  
23 you're BJ talks yes there you go bgk talks all right uh [ \_\_ ] I don't think I can see that  
message just message me click it it'll take you to my page and then just message me you  
realize I'm smart right of course Kevin oh there you

00:07:26

24  
25 are how did you found it there you go you're even all right hang up all right buddy yeah  
26 that's cool I see uh we never really talk and that's kind of interesting we've only talked on  
27 the phone but uh you're more than willing to go ahead and record so okay well where's my  
28 camera oh I'm I'm talking to it I can see it are you recording yes I'm recording now we are  
recording we are live live where on the recording oh so you are recording this yeah I'm  
recording now you told me to

00:08:13

1 what do you need for me I don't know you told me to call you you wanted me to call you I  
2 don't know okay look I don't know what the hell Brian and everyone is doing with you but I  
3 am not I don't want to be a part of it okay it's not fair do you feel I finally got my I'm a  
4 weather man dude right do you feel like he's put you in the middle of this yes I am in the  
5 middle you have no idea how much this makes me want to [ \_\_ ] kill myself well don't kill  
6 yourself no I'm

00:08:47

7 not going to do do you think he put your mom into the middle of this too yes so you are  
8 agreeing that that he he has a habit of throwing people he cares about under the bus yes and  
9 I'm sorry you have to go through that Kevin I think I think it takes courage to admit that but  
10 you know I hear you it sucks I'd be upset if my brother threw me under the bus to try and  
11 protect himself I just I don't want this anymore I mean look I brought him here he was  
12 going to get a nice old YouTube channel boy I don't give a [ \_\_ ]

00:09:33

13 uh now I mean who who cares it's gone I don't care but now it's under my name and I it  
14 really it's not fair to me all I did I did this on my heart that he well he asked you to right he  
15 asked you to put the the company under your name yes yeah and then he probably wanted  
16 the money to go to you and you would protect him yeah and now he's like the Channel's  
17 down give me my money yeah yeah not give him my money I mean I don't have access to  
18 the it's it's in your name but he

00:10:17

19 controls it essentially but that's that please don't go after me I no no no no Kevin Kevin  
20 this listen that's very important right he put it in your name but you have no no control over  
21 it so why would you be at fault I just wanted to save him I know he's your brother twin  
22 brother it's different his [ \_\_ ] twin brother it I I hear that Kevin I hear you and and you were  
23 minding your own business doing your own weather stuff I in fact I remember just a couple  
24 years ago you were saying you

00:10:51

25 know I don't want nothing to do with Kevin Brian's [ \_\_ ] I got my own life yeah this is the  
26 first time I actually seen you yeah in person no we we we met at VidCon no this yeah yeah  
27 oh by the way uh you you were actually my favorite uh YouTuber a long time ago I know  
28 you told me you told me you were my biggest fan bro no no I shat on you I was literally  
29 your first subscriber I loved it it was awesome yeah I couldn't believe when I found out that  
30 you and Brian are Budd heads I mean come on you know you my

00:11:34

31 favorite yeah yeah I hear you I hear you bro you had every you had everything but uh well I  
32 mean let's let's talk uh this YouTube thing I mean you were exactly where there was another  
33 one what was it a Fred or something yeah Fred Fred right yeah yeah there you go you got  
34 the same voice you got to do everything and then now everyone in YouTube doesn't make it  
35 anymore right they're obsolete now I am not obsolete I can still do it right what do you okay  
36 so let's go go continue go continue I don't I don't

00:12:24

37 know what you want me to say I don't know I'm trying to figure out exactly what I want you

1 to say well I mean it sounds like you and your brother have had had a falling out actually I  
2 don't give a [ \_\_\_ ] about Brian right now I know I I actually just want uh I want my life back  
3 right now Brian told me by the way he did say this that you're going to come after me that  
4 I'm going to come after you yeah well who has all the money you know what it's under my  
5 name yeah but who has control of that money

6 00:13:08

7 me oh so you control it but you're you're trying to give it back to Brian so you don't want  
8 nothing to do with it right yeah how much is it uh \$300,000 God damn and is is is part of  
9 you I make but I make uh \$100,000 you make \$100,000 a year from your weather stuff a  
10 month a month a month from your weather stuff well good for you [ \_\_\_ ] good for you dude  
11 that's good money no I just want to S so what are you going to do I don't even see you  
12 you're kind of like you can't see me

13 00:14:00

14 there you are hey you got a mustache oh you look you are good you're old very nice yeah  
15 you don't have any teeth no I lost this from fighting oh I know how to fight I do too Raven  
16 storm Raven storm look man I don't want any trouble I listen I I don't want I don't want to  
17 give you any trouble I don't want to get I don't want to dig you're already recording this and  
18 I know it well you told me to Kevin then guess what then you will use it against here's the  
19 thing

20 00:14:45

21 I don't want any trouble you know what let let me let me give you my word if if if you be  
22 your best friend we won't Hey listen you work with you work with me bro I won't come  
23 after you I give you my word I work with don't work with you that that \$300,000 whose  
24 money is that it's mine well where did it come from though a channel right and and whose  
25 money uh the money that the channel earns whose money is that look man is it is it fair to  
26 say that Brian owes millions of dollars and

27 00:15:26

28 that money belongs to the people that are in from him yes it you know I'm I'm not going to  
29 try and get in between you and your brother but it seems like your brother threw your mom  
30 under the bus when he told her to ignore the court papers and that he would take care of it  
31 he gonna he's gonna do that right he's gonna do the entire no no because mom called me and  
32 doing the [ \_\_\_ ] I mean he's throwing everyone on the bus the thing is he doesn't make  
33 honest money now I need to know something from

34 00:16:08

35 you yeah where did it start where did what start if I am G if I'm G to do this I I'm going to  
36 tell you right now uhhuh where it start and you will tell me where it start if I find out that it  
37 started completely legit then I would will work on your side now I need to know where this  
38 lawsuit started I I don't care no back then I don't care the video games I don't give a [ \_\_\_ ]  
39 right where the [ \_\_\_ ] did it come from it came from your brother's Behavior okay well what  
40 did he offer and

41 00:16:52

42 what happened so I need to know yeah yeah yeah no I hear you so here's the thing right we  
43 invested in video games we were promised a how much i500 from me and 1500 from

1 timeos but remember but hold on Kevin this was at a time where the channel didn't even  
2 exist okay nonetheless here's the issue right you have to tell me everything right now well I  
3 will make my decision and you're recording this is great make okay I need to know because  
4 you know what I'm starting to think Brian is an I need to

00:17:33

4 know because you know what we listen saying something that I already you know this you  
5 already know this we had a contract we had a contract just tell me tell me what you just said  
6 15 just please tell me 30 30% the deal the deal was 30% and then he came back later and  
7 said no you guys don't own any and then I said well we need to come to an agreement so me  
8 your brother and and uh uh what's his name Marco prip all agreed 33% each and then and  
9 he emailed me this Kevin he emailed me confirming that I

00:18:17

9 owned that percentage that he agreed to it and then he turned around and said [ \_\_\_ ] off and  
10 then I said Hey listen this this is the import hold on Kevin Kevin Kevin Kevin listen no no  
11 no no no you I had everything I need to know stop it well look okay I'm not going to defend  
12 him anymore okay I can't okay but the thing is you can't come after me well I you've  
13 already said that you would help us so there's no reason to come after you no I it just I just  
14 you know what and I alone I I made it hey I I yes

00:19:00

13 you Kevin I'm going to tell you this if you help us collect on our debt our judgment and you  
14 make what Deb he has no money well you have \$300,000 of his so he does have money he's  
15 making money my name yes he put it under your name to Shield him and and when the IRS  
16 comes knocking yeah but he's being sued for \$20 million well he was sued for less and they  
17 they awarded more because of his behavior okay what do you guys want well just just give  
18 just let him have something please let's

00:19:39

18 come to a compromise no I hear you Hey listen I've we've we've tried to have these  
19 conversations with him no we have it because I wasn't making this much well I don't want a  
20 part of this so why not I have to do a compromise what do you want well me personally I  
21 don't want anything but I know I don't care get your lawyers away and I will give you the  
22 parties we what split it okay good I mean that's a perfect that's the thing you just split it well  
23 I mean it doesn't make any sense

00:20:21

22 I mean you want the money okay yes he [ \_\_\_ ] you up okay I'm sorry uh I wasn't part of that  
23 no I know but but you see you see how he's he's using you and putting you in the middle of  
24 this and lining you up to to you're well you're going to use that and you're going to sue me  
25 well no what I think I I think we can whatever Kevin Kevin I think we can use that I think  
26 we can use that to say hey just make sure that money goes to the proper owners and I I can  
27 guarantee you we wouldn't we

00:20:56

27 wouldn't touch you if you did that we would leave you the [ \_\_\_ ] alone for sure you're you're  
28 the entire 300,000 leave me alone there done you do that you take it you take it you leave  
me alone I I I think I would have to hear you say this when you're sober because you're

1 drunk no no no no because I don't care uh sober is different because I can make the decision  
2 on my behalf uh this is nothing it's a [ \_\_ ] Bud Light no I hear you what would you do  
3 transfer it how you leave him alone and call

00:21:37

4 everything off how would you transfer it Kevin I would I would I would transfer the entire  
5 300,000 I would you you let me you you call off your lawyers and you get 300,000 that's it  
6 what's what bank is it in uh it's a chase you got it in the Chase Bank no tell I'm actually  
7 giving you an offer right I will give you the entire 300 well if you just close it but because I  
8 am you no if I don't I'm gonna die no Kevin Kevin don't like it Kevin Kevin what I can  
9 assure you is that if

00:22:17

10 you were to get that give that to us because you know it rightfully belongs to us I can give  
11 you my word that I will make sure you do not get sued your brother your brother is a  
12 different story he's you the money what's that I'll give it the money okay you have 300,000  
13 and that that's it and you can just stop this entire I will Hey listen I will make sure if you  
14 gave us that 300,000 I give you my word I will talk to the lawyers make sure they do not  
15 Sue you please I give you my word

00:22:53

16 and I'll keep this quiet I won't tell Brian you told me this or none of it okay okay and then  
17 you leave us alone well look I don't want to be a part of this no no no no no we will leave  
18 you alone but the lawyers still have to deal with Brian and his behavior but that has nothing  
19 to do with you and your brother should not no I can't then I can't do that Brian needs to be  
20 left alone okay that's a stipulate he has to be left alone I want Brian okay Al listen if I'll  
21 give you the 300,000

00:23:28

22 okay look look look look look that side doesn't make much money that's fine I'll give you  
23 whatever I have on my name for them okay but the thing is I want you to leave my brother  
24 alone period that might be Hey listen Hey listen Kevin that might be fair okay but I'm  
25 telling you besides me there are like five other people who are involved with this decision  
26 let's do this okay you send me proof that you have that 300K and I'll give it to the lawyers  
27 and then we can talk about hey if he gives

00:24:01

28 us that money maybe we do just drop this all and leave it alone but we got you got to do a  
show of good faith to show that you're you're being honest here I mean I I have no reason to  
disbelieve you except for I'm not even laughing right now that's what you show good faith  
well you got you got online access you you you got online access to it you could I got  
everything I'm sick of [ \_\_ ] go online take a screenshot of your uh of the money in I can't  
do it right now okay well whenever you have to

00:24:36

come to an agreement well remember I I'm I can't agree to anything unless all of the  
lawyers see everything and they tell me it's okay to agree you know what I'm saying all I  
want is is what do we have to do on this side for you to just drop it right I hear you I I hear  
you Kevin I do yeah well here's the thing Ryan told me not to trust you well of course he

1 told you not to trust me when you say you hear me you're you're going to sue me aren't you  
no I'm not going to sue you I

2 00:25:11

3 give you my word I'm not going to sue you you sure yeah I have no plans on suing you  
4 good because I'm recording too good and you're recording too okay so there you go then  
okay then we can just go just get rid of it look I don't want trouble with this [ \_\_ ] family  
5 anymore it's it's killing me look at my hair for Christ's sake no I hear you I hear you dude  
[ \_\_ ] you guys are killing me every single one of you Brian well yeah I it's unfortunate that  
6 Brian's bringing you into all of this

7 00:25:49

8 you know what I mean because Hol everyone they're [ \_\_ ] are you in the Simone property  
is that where you're at the Simone Lane simmeron if you do that again I literally will go  
9 after you do what you're not taking the property no no I'm asking you where you are I'm not  
touching Monopoly I'm not touch is Monopoly Kevin I'm not touching anything I'm just  
10 asking I'm just asking where you are dude why I don't even know where you're at okay give  
me your give me your location I'm I'm at 507

11 00:26:32

12 Rockland Avenue in Lake Bluff Illinois oh so you had the tornadoes coming back two days  
ago yeah but you know I'm prepared for that kind of [ \_\_ ] I thought you were in North  
13 Carolina no that's Ty I'm Chicago that's that's Ty say say your address 507 Rockland  
Avenue your brother has [Music] it who owns this the simmeron Lane house it's not you  
14 actually it's uh it's her dad whose dad your wife's Dad yeah you guys are saying that your  
15 wife's dad's house he he actually works in Ohio so

16 00:27:28

17 you guys split would you have to move no because I make too much you're making 100  
Grand a month that's [ \_\_ ] insane dude I literally can do whatever I want right now well  
18 good for you and the thing is uh yeah you want you want your hands on this money well I  
think the lawyers want their hands on that money since it's ours do you know what I mean  
19 well no it doesn't matter I mean here's the thing I I I'm if you're recording I'm done what do  
20 you mean leave alone leave me alone well you know I can do

21 00:28:01

22 whatever he wants I think if you if you got my money now I think if you were to transfer  
that money to us that that that would keep us off you it'd be the right thing it wouldn't be a  
23 fraudulent transfer because you're giving it to the rightful owner if you gave it to Brian we  
might have an issue with that right and you have no idea Brandon what you are walking into  
24 right now well listen it's not it's not me walking into it right we have a US sen uh we have a  
a state senator we have a former judge and

25 00:28:34

26 we also have one of the lead attorneys for AT&T that are all where did it come from though  
what what what did he do wrong what did Brian do wrong years of being Brian God damn  
27 it I think you know this I told him not to do this I think you know this it's years of him  
doing this here here's you know it I think it's cool that you're saying you'd be willing to give  
28 the money but you are drunk right now so no no no don't worry about being no no I'm not

1 drunk okay I'm

2 00:29:05

3 I'm willing to no no no don't worry he drunk is kind of stumbling around this is what you  
4 should do okay if you email Dan or Craig and say Hey listen I I have the money that Brian  
5 Brian's been having me hold this money and I know it's yours if I give this money to you  
6 guys will you can I get your word that you will not sue me and I guarantee you the [ \_\_\_ ]  
7 attorneys are going to say yes we can promise you that because you're doing the right thing  
8 if you weren't to do the right thing and you were to to

9 00:29:38

10 play this scam even longer then it would probably piss people off but you're doing the right  
11 thing Kevin scam whatever it's called what am I you're holding his money it's scam it's not a  
12 scam but you're holding his money that's that's that's uh there's words for that like holding  
13 your money I guess yeah you're holding our money and if you were to give it to him then  
14 they I I think along here's the thing here's the thing yeah Brandon uh I believe you

15 00:30:13

16 okay Brian was an idiot I understand it but don't ruin his life oh no I don't want to ruin his  
17 life you can give you let's just you here's the thing I can't give you the money unless I say  
18 no I need to make sure every side says just let it go I give it sounds like you're holding all  
19 the keys you're holding the ball this is I have it now well because guess what it it sucks  
20 Kevin stupidest goddamn thing I've ever done it makes me cry I know listen I know I know  
21 you regret doing this you

22 00:30:52

23 don't want to help your brother do this [ \_\_\_ ] do the let me let me just tell you this Kevin  
24 email Dan and Craig and say Hey listen I don't know it's email do you want me to email and  
25 CCU and then you can okay I'm gonna hang we I I will okay I will agree to uh so okay so  
26 if I give 300,000 it's over again remember it's the lawyers you have to talk to I don't care let  
27 so let's do this let's do this okay you want hey hey hey hey hey yeah do you guys want uh  
28 look look like I get a part-time job

29 00:31:41

30 on my team for uh social media director I mean come on we can work this out okay you you  
31 guys aren't working with me just just so you know 300,000 isn't going to anywhere mean it  
32 really okay you got lawyers and you got a [ \_\_\_ ] okay look he doesn't have it right you do I  
33 get it okay I okay look at me I get I got it but the thing is I mean what what what do I do uh  
34 you I can actually hire you for social media director right part-time of course and there you  
35 go boom you get \$2,000 a month just like that mhm see

36 00:32:26

37 it's simple but the but but it's growing I need to know what the hell I'm up against right now  
38 you guys seem to be completely [ \_\_\_ ] weird well I kind of I've been I've been sitting in the  
39 in the background while the lawyers do all the lawyering [ \_\_\_ ] so well I know you keep  
40 doing that but I'm kind of an idiot when it comes to that you know what I mean every time  
41 you call me it's like it it feels like that you're trying to uh say I'm an idiot or something who

42 00:33:05

1 me no every time you call me it's like Hey Kevin how you doing but it's like you're trying to  
2 get something for me you think I'm doing that yeah I've only called you one time I've called  
3 you one time in the last year and that was that was because I was like what the [ \_\_ ]  
4 happened with the we we okay we need to work together to get this moving okay because I  
5 do not want this anymore okay I'm sorry I I just don't want this anymore this is not I finally  
6 made it and I am I have been waiting I didn't

00:33:41

7 make it last year I thought right I made it I need this yeah you guys want that money then I  
8 will give you godamn well the lawyers the lawyers want I won't I won't get a penny of it  
9 well then I'm gonna hire you all right well I think I think the best bet I think the best bet  
10 would be to email the attorneys and say hey I'm holding this money you do it and and CCU  
11 you no you email your attorneys and go ahead and and um I I made a deal okay well let's do  
12 this okay it sounds like we're at a deal

00:34:25

13 right now but it's getting late I'm going to be going to bed here soon yes sleep this off and  
14 let me know how you feel tomorrow Hey listen I don't need to sleep at all all right well I'm  
15 I'm going to I'm telling you right now I'm I'm not going to tell your brother about the  
16 conversation we had this is between me and you okay you know what I mean do you want  
17 to do the deal dude I I of course I want to get the money that's ours okay well here's the  
18 thing I have

00:34:51

19 to crush this entire thing I hear you so so let's see what the lawyers say about it okay.

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END TRANSCRIPT

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**EXHIBIT B**

<p><b>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</b>  <b>MARK S. ROSEN (SBN 72431)</b>                  Attorney at Law                  27281 Las Ramblas, Ste. 200                  Mission Viejo, CA 92691                  714-285-9838                  marksrosen@aol.com</p> <p><b>VAN T. TRAN (SBN 174264)</b>                  Attorney at Law                  1502 N. Broadway                  Santa Ana, CA 92701                  949-260-8404</p> <p><input type="checkbox"/> Individual appearing without attorney  <input checked="" type="checkbox"/> Attorney for: Plaintiffs</p>	<p><b>FOR COURT USE ONLY</b></p>
<p><b>UNITED STATES BANKRUPTCY COURT                  CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION</b></p>	
<p><b>In re:</b>                   Brian Dennis Martin</p> <p style="text-align: right;"><b>Debtor(s).</b></p>	<p><b>CASE NO.:</b> 6-25-bk-10944-MH   <b>ADVERSARY NO.:</b> 6-25-ap-01055-RB   <b>CHAPTER:</b> 7</p>
<p><b>David Tyler Moss and Fidelissimus, LLC</b></p> <p style="text-align: right;"><b>Plaintiff(s).</b></p> <p style="text-align: center;"><b>vs.</b></p> <p><b>Brian Dennis Martin</b></p> <p style="text-align: right;"><b>Defendant(s).</b></p>	<p style="text-align: center;"><b>JOINT STATUS REPORT                  [LBR 7016-1(a)(2)]</b></p> <p><b>DATE:</b> 10/21/2025  <b>TIME:</b> 2:00 p.m.  <b>COURTROOM:</b> 303  <b>ADDRESS:</b> 3420 Twelfth Avenue                  Riverside, CA 92501</p>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

**A. PLEADINGS/SERVICE:**

- |   |   |
|---|---|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents?                                 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved?                                  | <input type="checkbox"/> Yes <input type="checkbox"/> No            |
| 4. Have counsel met and conferred in compliance with LBR 7026-1?                                      | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (or on attached page):

**B. READINESS FOR TRIAL:**

- |  |  |
|--|--|
| 1. When will you be ready for trial in this case?<br><u>Plaintiff</u><br><br>In four months  | <u>Defendant</u><br><br>In four months.  |
| 2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.<br><u>Plaintiff</u>                          | <u>Defendant</u>   |
| 3. When do you expect to complete <u>your</u> discovery efforts?<br><u>Plaintiff</u><br>In the next four months, subject to motions to compel from subpoenaed nonparties | <u>Defendant</u><br><br>Within 3 months.   |
| 4. What additional discovery do you require to prepare for trial?<br><u>Plaintiff</u><br>Discovery of hidden assets  | <u>Defendant</u><br><br>Requests for productions of documents, interrogatories may be necessary. |

**C. TRIAL TIME:**

- |  |   |
|--|---|
| 1. What is your estimate of the time required to present <u>your side of the case</u> at trial (including rebuttal stage if applicable)?<br><u>Plaintiff</u><br><br>Two days   | <u>Defendant</u><br><br>2-3 days.             |
| 2. How many witnesses do you intend to call at trial (including opposing parties)?<br><u>Plaintiff</u><br><br>Unknown. Much of plaintiff's case is based on judgments already entered against defendant in other courts, but the concealment of assets may require multiple witnesses. | <u>Defendant</u><br><br>Unknown at this time. |

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

3. How many exhibits do you anticipate using at trial?

Plaintiff  
Three exhibits to show rulings in other courts; unknown as to concealment of assets

Defendant  
Unknown at this time.

**D. PRETRIAL CONFERENCE:**

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff  
Pretrial conference  is  is not requested  
Reasons:

To clarify the issues before the court and to determine if any part of the case should be remanded to the Texas state court.

Plaintiff  
Pretrial conference should be set after:  
(date) 01/01/2026

Defendant  
Pretrial conference  is  is not requested  
Reasons:

Defendant  
Pretrial conference should be set after:  
(date) 1/5/2026

**E. SETTLEMENT:**

1. What is the status of settlement efforts?

The parties tried the three underlying cases without settlement. Any settlement may have to wait to see if defendant gets new counsel.

For Defendant: the parties have not engaged in any settlement discussions; counsel for Defendant has filed a motion to withdraw; Defendant may need additional time to obtain new counsel.

2. Has this dispute been formally mediated?  Yes  No  
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff  
 Yes  No

Defendant  
 Yes  No

**F. FINAL JUDGMENT/ORDER:**

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff  
 I do consent  
 I do not consent  
to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant  
 I do consent  
 I do not consent  
to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

**G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)**

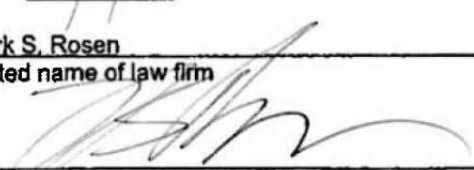
The First Amended Complaint is based on three cases already tried in Texas:

1. Case Number 3:14-CV-03088-BF in the Northern District of Texas, judgment in favor of plaintiffs against defendant for \$18,600,000, including fraud, breach of fiduciary duty, conspiracy, affirmed in Moss v Princip, 913 F.3d 508 (5th Cir. 2019)
2. Case Number 429-05678-2020, 429th Judicial District in Collin County, Texas, for amounts exceeding \$1,000,000 for fraudulent transfer, civil conspiracy, aiding and abetting, conversion, civil theft, fraud, trespass. This judgment was not appealed and is final.
3. Case Number DC-20-09893, 68th Judicial District in Dallas County, Texas, under the Texas Uniform Transfer Act and other causes of action. Judgment was entered for plaintiffs. On appeal, portions of the judgment were reversed and remanded to the trial court. The bankruptcy filing has stayed proceedings in the court.

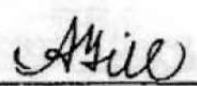
Plaintiffs believe that the judgments in the first two cases are conclusive on nondischargeability of the debt. In the third case, the automatic stay should be lifted so the case can be retried in Texas. (The alternative is to try the case in the bankruptcy court.) This would leave the issue of the dischargeability of the debtor to be tried in this court.

For Defendant: Case 3:14-cv-03088-BF is on appeal at the 5th Circuit Court of Appeals, case no. 24-10848. The appellate proceedings are stayed due to the bankruptcy filing, but Defendant may wish to prosecute the appeal. Defendant has counsel representing him on appeal.

Respectfully submitted,

Date: 10/7/25  
Mark S. Rosen  
Printed name of law firm  
  
Signature

Mark S. Rosen  
Printed name  
Attorney for: Plaintiffs

Date: 10/7/25  
Law Offices of Michael Jay Berger  
Printed name of law firm  
  
Signature

Angela N. Gill  
Printed name  
Attorney for: Brian Martin, Defendant

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# EXHIBIT C

[https://drive.google.com/file/d/11GhPZlQjQJUXXB\\_jZFL617UIyvaajveA/view?usp=sharing](https://drive.google.com/file/d/11GhPZlQjQJUXXB_jZFL617UIyvaajveA/view?usp=sharing)

(See Judge's USB Copy)

Protective\_Order\_EXHIBIT\_C\_625ap01055RB

Oct 1, 2025

And the walls are closing in...

**B**

**BrandonTalks**  
kiwifarms.net  
Joined: Apr 5, 2021

0:00 / 0:08

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Oct 10, 2025

LiquidChrisRespecter said: ☹️

he can get to work changing consumer law so that private businesses can be compelled to a serve every crazy that demands it. 🤷

He'll have to change the laws after he's released from prison.

**B**

**BrandonTalks**  
kiwifarms.net  
Joined: Apr 5, 2021

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**EXHIBIT D**

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**KIWI FARMS** Forums Chat What's new Members Log in Register Search

Current visitors

Members

EU Gamers eu have risen tf up: after a coordinated July 2nd push, the Stop Killing Games initiative has received over 100,000 signatures in a single day, Maldivius Figree still sits smugly - there's only a month left to collect another 130,000 signatures, and who knows how many more once the EU starts eliminating fraudulent signers. Every European counts - for the first time in history!

**BrandonTalks**  
 Joined: Apr 5, 2021  
 Last seen: 3 minutes ago · Viewing thread *Brian Martin / Lifeinatent / FuturisticHub*  
 Messages: 11  
 Reaction score: Positive

Latest activity Postings About

- BrandonTalks replied to the thread *Brian Martin / Lifeinatent / FuturisticHub*.  
I think he's already paid roughly 2 million through cash and asset seizure. We definitely disagree with each other on how this...  
Yesterday at 6:17 AM
- BrandonTalks replied to the thread *Brian Martin / Lifeinatent / FuturisticHub*.  
I heard this thread was popping again. This person has threatened me several times to stay off this site. I don't really come on here...  
Yesterday at 6:06 AM
- BrandonTalks replied to the thread *Brian Martin / Lifeinatent / FuturisticHub*.  
this was supposed to be a documentary about Brian but it's from a year or two ago so I'm assuming the documentary isn't coming out.  
Jun 25, 2025

### About Kiwi Farms :

Kiwi Farms, established in 2013 by Joshua Conner Moon, functions as an online forum for discussion and harassment. Initially targeting webcomic artist Christine Weston Chandler, the site is known for organized group trolling, stalking, doxxing, and real-life harassment, often directed at transgender individuals, those with disabilities, and neurodivergent people. The platform has been connected to several suicides and has received criticism and service terminations due to its controversial content and association with harassment. [Less ^](#)