

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION**

MICHAEL T. FLYNN,

Plaintiff,

Case No. 2023-CA-004264 NC

v.

Division C Circuit

JIM STEWARTSON; RICK WILSON;
AND MEIDASTOUCH, LLC,

Defendants.

_____ /

NOTICE OF FILING HEARING TRANSCRIPT

Defendant, Rick Wilson, gives notice of filing as Exhibit A the transcript of the hearing conducted on December 19, 2023, on Defendant Jim Stewartson's Motion to Dismiss Amended Complaint (DIN 21), filed on August 1, 2023; Defendant Rick Wilson's Motion to Dismiss/Motion for Summary Judgment Pursuant to Section 786.265 Florida Statutes (DIN 34) and Request for Judicial Notice (DIN 35), filed on October 25, 2023; and Plaintiff's Motion for Leave to File Second Amended Complaint (DIN 37), filed on November 3, 2023.

Dated: April 17, 2025.

/s/ Leonard M. Collins

Leonard M. Collins (FBN: 423210)

GRAYROBINSON, P.A.

301 S. Bronough Street, Suite 600

Tallahassee, Florida 32301

Telephone: 850-577-9090

leonard.collins@gray-robinson.com

Attorney for Defendant, Rick Wilson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided to the following via electronic mail on April 17, 2025.

Craig A. Whisenhunt
RIPLEY WHISENHUNT, PLLC
8130 66th Street North, Suite 3
Pinellas Park, Florida 33781
Telephone: 727-256-1660
craiggrwrlawfirm.com
efiling@rightingwrongsflorida.com
Attorneys for Defendant, Jim Stewartson

George K. Randert
George A.D. Thurlow
RANDERT & MORTIMER, PLLC
535 Central Avenue, Suite 200
St. Petersburg, Florida 33701
Telephone: 727-823-4191
grandertarandertlaw.com
service@arandertlaw.com
gthurlow@randertlaw.com
tmccreary@randertlaw.com
Attorneys for Defendant, Jim Stewartson

Jared J. Roberts
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Telephone: 703-888-1943
jared@binnall.com
Counsel for Plaintiff, Michael T. Flynn

Jonathan R. Huffman
James A. Boatman, Jr.
BOATMAN RICCI
3021 Airport-Pulling Rd. N., Suite 202
Naples, Florida 34105
Telephone: 239-330-1494
courtfilings@boatnmanricci.com
jrh@boatmanricci.com
Attorneys for Plaintiff, Michael T. Flynn

/s/ Leonard M. Collins
Leonard M. Collins (FBN: 423210)
GRAYROBINSON, P.A.

Exhibit A

1 IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
2 IN AND FOR SARASOTA COUNTY, STATE OF FLORIDA
3 CIVIL ACTION

4 MICHAEL T. FLYNN, an
5 Individual,

6 Plaintiff,

Case No. 2023-CA-004264 NC

7 v.

8 JIM STEWARTSON and RICK
9 WILSON,

10 Defendants.

11 _____/

12

13

14

MOTION HEARING

15

16

17 DATE: December 19, 2023

18 JUDGE: The Honorable Hunter Carroll

19 LOCATION: Judge Silvertooth Judicial Center
20 2002 Ringling Boulevard
21 Sarasota, FL 34237

22 STENOGRAPHER: Lisa Plante, RPR, FPR-C

23

24

25

Job No. 337167

1 A P P E A R A N C E S

2 On Behalf of Plaintiff:

3 BOATMAN RICCI, P.A.
12751 New Brittany Boulevard, Suite 402
4 Fort Myers, FL 33907-3669
(239) 330-1494

5
6 BY: JONATHAN R. HUFFMAN, Esquire
jrh@boatmanricci.com

7 BINNALL LAW GROUP
717 King Street, Suite 200
8 Alexandria, VA 22314
(703) 888-1943

9
10 BY: JARED J. ROBERTS, Esquire
jared@binnall.com

11
12 On Behalf of Defendant, Jim Stewartson:

13 RIPLEY WHISENHUNT, PLLC
8130 66th Street North, Suite 3
Pinellas Park, FL 33781-2111
14 (727) 256-1660

15 BY: CRAIG A. WHISENHUNT, Esquire
craig@rwrlawfirm.com

16 RAHDERT & MORTIMER, PLLC
17 535 Central Avenue, Suite 200
St. Petersburg, FL 33701
18 (727) 823-4191

19 BY: GEORGE A. D. THURLOW, Esquire
gthurlow@rahdertlaw.com

20

21 On Behalf of Defendant, Rick Wilson/MeidasTouch, LLC:

22 GRAY-ROBINSON, P.A.
301 South Bronough Street, Suite 600
23 Tallahassee, FL 32301
(305) 904-4973

24
25 BY: LEONARD COLLINS, Esquire
leonard.collins@gray-robinson.com

1

I N D E X

4	Motion to Amend Complaint:	Page 3
		PAGE
5	Argument by Mr. Huffman	5
6	Argument by Mr. Collins	7
7	Argument by Mr. Whisenhunt	9
8	Ruling by the Court	10
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 [PROCEEDINGS BEGAN AT THE JUDGE LYNN N. SILVERTOOTH
2 JUDICIAL CENTER, COURTROOM 6C, SARASOTA, FLORIDA, ON
3 DECEMBER 19, 2023, AT 2:00 P.M.]

4 * * *

5 THE COURT: This is case number
6 2023-CA-4264, Michael T. Flynn v. Jim Stewartson
7 and Rick Wilson.

8 Starting with the plaintiff, let's take
9 appearances, please.

10 MR. HUFFMAN: Good afternoon, Your Honor.
11 Jonathan Huffman from the Boatman Ricci Law Firm.

12 And with me, as well, is Jared Roberts from
13 the Binnall Law Group.

14 MR. WHISENHUNT: Good morning, Your Honor.
15 Appearing on behalf of Jim Stewartson, I'm Craig
16 Whisenhunt.

17 MR. THURLOW: Appearing on behalf of Jim
18 Stewartson, as well, George Thurlow.

19 MR. COLLINS: Appearing on behalf of Rick
20 Wilson, Leonard Collins.

21 THE COURT: My understanding is we have
22 quite a few motions, motions to dismiss, summary
23 judgment, and requests for judicial notice.

24 The motion to dismiss is at docket
25 identification number, or DIN, 21. That was filed

1 by defendant Stewartson.

2 At DIN 34 is the motion to dismiss/motion
3 for summary judgment, and that's filed by
4 defendant Rick Wilson.

5 And at DIN 35, I have the request for
6 judicial notice filed by defendant Wilson.

7 Am I missing anything that we're here on?

8 MR. HUFFMAN: Yes, your Honor, there was
9 one more motion noticed for hearing, and that is
10 plaintiff's motion for leave to file a second
11 amended complaint.

12 THE COURT: And that's at DIN 37.

13 MR. HUFFMAN: Thank you, Your Honor.

14 THE COURT: Let's first deal with the
15 motion to amend the complaint.

16 MR. HUFFMAN: Thank you, Your Honor. May
17 it please the Court.

18 As Your Honor probably knows, the standard
19 in Florida is that the Court should be, quote,
20 "especially liberal when leave to amend is sought
21 at or before a hearing on motion for summary
22 judgment," end quote. That's the Thompson case
23 cited on page 1 of our motion to amend.

24 Based on the Court's ruling today, the
25 defendants may want an opportunity to revisit

1 their motions in light of the new complaint, or
2 they may still wish to proceed today, and the
3 plaintiff is fine with either choice, Your Honor.

4 The amendment is based on tortious conduct
5 that happened after this lawsuit was filed. In
6 late October of this year, defendant Stewartson
7 joined the sizable media platform called
8 MeidasTouch, which has published his continued
9 defamatory statements about General Michael Flynn
10 to its nearly two million users. It has an online
11 presence, in addition to its Youtube platform, and
12 reaches millions of people.

13 The complaint was previously amended as of
14 right for a similar reason after the defendant
15 Wilson amplified defendant Stewartson's defamatory
16 statements and added similar ones of his own to
17 Mr. Wilson's much larger audience than
18 Mr. Stewartson's.

19 So this is actually the first motion to
20 amend that has been filed, and we believe the
21 amendment should be granted because the privilege
22 to amend hasn't been abused. As I just said, this
23 is plaintiff's first motion to amend, and it's
24 based upon new developments. The requested
25 amendment is not futile, as the proposed complaint

1 plainly states properly complaints with their
2 requisite elements, as did their predecessors.
3 And the amendment will not prejudice the
4 defendants this early in the case. Indeed, Your
5 Honor, no one has answered yet. If the amendment
6 is granted, and if the defendants want to proceed
7 with their other motions today, as I said,
8 plaintiff is fine with the Court ruling on those
9 motions as to the new complaint so that we don't
10 have to repeat this same exercise and to make good
11 use of Your Honor's time here.

12 The new version is very similar as to the
13 existing defendants, but it's important because
14 the reach of the defamatory statements has been
15 greatly expanded, and there's a new participant in
16 that, Your Honor, and we would contend that none
17 of the permissible grounds to deny an amendment
18 have really been asserted here, but could be
19 substantiated. So we respectfully request leave
20 for the amendment.

21 THE COURT: Who wants to go first on the
22 defense side?

23 MR. COLLINS: Thank you, Your Honor, I'm
24 here on behalf of defendant Rick Wilson.

25 Their motion for leave to amend is futile,

1 and I would ask the Court, perhaps, to reserve
2 judgment on this particular issue until we have an
3 opportunity to lay out in our motion to
4 dismiss/motion for summary judgment as to why.

5 This lawsuit is frivolous on its face. It
6 makes allegations that are not -- it suggests that
7 the First Amendment somehow doesn't apply to
8 Mr. Wilson or to Mr. Stewartson when it plainly
9 does.

10 And under applicable case law, the
11 statements that we're talking about here, my
12 client is accused of calling the defendant a
13 "Putin employee" and tweeting it on the same day
14 that the -- the same day that Russia invaded
15 Ukraine, and the same day that General Flynn
16 issued a statement at length explaining why,
17 somehow providing justifications, for what Russia
18 did. And so my client had an opportunity to
19 respond to that in the course of his free speech
20 right.

21 The Court shouldn't allow this matter to
22 continue. Under the Anti-SLAPP Statute,
23 defendants in this circumstance are entitled to an
24 expedited process, expedited hearing, and
25 permitting a party to continually amend their

1 complaint, as is the case here, denies us the
2 ability to bring this matter to its conclusion.

3 So I would ask the Court to deny, and we'll
4 get into more detail at length in the coming
5 hearing on the motion to dismiss/motion for
6 summary judgment.

7 MR. WHISENHUNT: Good afternoon, Your
8 Honor. Again, Craig Whisenhunt on behalf of Jim
9 Stewartson.

10 I disagree with Mr. Collins that futility
11 is at issue here. The proposed second amended
12 complaint fails to correct any of the flaws that
13 have been previously raised in the motions to
14 dismiss. All of those simply include now yet
15 another defendant for a wholly separate claim of
16 defamation from a separate date of occurrence.

17 Surely if the plaintiff feels it's
18 appropriate to pursue a defamation against the
19 MeidasTouch Network, they can do so independently
20 of this lawsuit, without it being a burden to the
21 system any more so than this lawsuit is proving
22 its not going to be a burden at all. But to allow
23 the continuing evolution of a claim that will
24 ultimately always fail pursuant to First Amendment
25 protections guaranteed to defendants, it would be

1 an abuse of the process, a miscarriage of justice,
2 to allow them to manipulate the system in this way
3 at this time.

4 We're respectfully asking the Court to deny
5 the plaintiff's motion for a second amended
6 complaint.

7 THE COURT: Any response from the
8 plaintiffs?

9 MR. HUFFMAN: Nothing further, Your Honor.

10 THE COURT: Okay. I am going to allow the
11 amendment.

12 Now, let's talk about some of the logistics
13 on the amendment. Obviously, we have a couple of
14 the folks already in the case. How many days do
15 you want to file whatever pleading or filing that
16 you wish to make? Go ahead, Mr. Collins.

17 MR. COLLINS: So, Your Honor, under
18 768.295, a party, a defendant, is entitled to an
19 expedited process and expedited hearing.

20 Mr. Wilson has waited now for months to
21 address these issues with the Court. My concern
22 is that we're not going to have an opportunity to
23 address our underlying motions based on the
24 Court's ruling.

25 THE COURT: Well, that's why I'm asking you

1 for a specific number of days that you want,
2 because ultimately if we're going to have to
3 reconnect with some sort of motion to dismiss or
4 summary judgment hearing when we actually have a
5 complaint that is operative, then I'm here to talk
6 about timing.

7 MR. COLLINS: But, Judge, the complaint --

8 THE COURT: I hear what you're saying, but
9 we don't have an operative complaint right now
10 because I'm allowing an amended pleading.

11 MR. COLLINS: But the amended --

12 THE COURT: I understand what the SLAPP
13 statute is.

14 MR. COLLINS: But the amended pleading
15 doesn't amend anything with regard to my client.
16 My client is entitled to a hearing. We've come a
17 long way, Your Honor. This is not inexpensive
18 and --

19 THE COURT: Let's talk about how many days,
20 and then we'll talk about setting a hearing, which
21 you're going to get a specially set hearing, which
22 is a lot faster than what other cases are going to
23 get. I hear you. I agree with you that you are
24 going to get an expedited hearing. It's just I
25 want to make sure I'm not doing this multiple

1 times before -- you know, I want to try to be as
2 efficient with this as possible. I know you feel
3 like you want to have the hearing right here,
4 right now, but we've got an amended pleading, and
5 that's what we're going to do.

6 So, you know, the plaintiff is going to
7 file their second amended complaint within five
8 days of today's date.

9 How many days do you want to file any sort
10 of response?

11 MR. HUFFMAN: If I may, I believe the
12 plaintiff in their motion for leave to amend
13 incorporated, by reference, the amended complaint
14 they sought to have filed, per the Rule.
15 Accordingly, I believe that as the Court has
16 granted leave to amend, it is then filed.

17 THE COURT: No, I do not deem filed
18 pleadings, and here's the reason why.

19 MR. HUFFMAN: Sure.

20 THE COURT: Because right now, it's an
21 attachment to a motion that does not get docketed
22 by the clerk as a pleading, so that's why I always
23 require a standalone document. I always reject
24 pleadings that talk about I'm going to deem filed
25 pleadings. That's not right because our system --

1 or, I should say the clerk's system doesn't allow
2 me to find it. So I need to be able to find it,
3 and so that's why I require a standalone pleading.
4 So that's what we're going to do.

5 He's got five days. How many days do you
6 want to file a response, if any.

7 MR. WHISENHUNT: Your Honor, I can only
8 speak as defendant Stewartson. We will be filing,
9 for all practical purposes, an identical motion to
10 dismiss as we did initially, and then, again, as
11 we did in the first amended complaint. There is
12 nothing substantively evolved in the second
13 amended complaint that applies to Mr. Stewartson.
14 It's simply a new party. So I --

15 THE COURT: How many days do you want?

16 MR. WHISENHUNT: 24 hours from the time
17 they file.

18 THE COURT: Okay. Well, I hear -- if you
19 want to take 24 hours, that's fine, but I'm giving
20 you an outer limit. So do you want 10 days? Do
21 you want 20 days? These are days that you
22 control.

23 MR. WHISENHUNT: If they have five days to
24 file, then if we can have five days to file our
25 responsive motion to dismiss.

1 And I believe the plaintiff has
2 communicated that they're prepared to address the
3 underlying concerns raised in our motions today if
4 the Court is willing to hear it.

5 THE COURT: And the out of state --
6 sorry -- the party that is being added is out of
7 state; is that correct?

8 MR. HUFFMAN: Yes, sir. It's an LLC, so it
9 may not take us long to serve them. I'm not sure
10 what their circumstances are yet.

11 THE COURT: No, we're not going to hear it
12 today. I don't have an operative complaint at
13 this moment.

14 So I'm going to do the order on the amended
15 pleading. I'm going to enter it today, so that
16 clock starts today. And I'm willing to figure out
17 a time that we all can reconnect for a hearing.

18 Now, first off, is one hour enough time for
19 this entire issue -- or issues, I should say?

20 MR. HUFFMAN: From the plaintiff's
21 standpoint, I believe it is.

22 MR. COLLINS: From the defendants'
23 standpoint, I believe not. If the three
24 defendants here are all arguing anti-SLAPP, I
25 worry about time. You're going to have three

1 different anti-SLAPP motions that you're going to
2 need to dispose of Your Honor, and that may take
3 more than an hour.

4 THE COURT: Well, here's the thing. I
5 mean, obviously, I'm going to want the other
6 defendant in, but if they delay in getting them
7 served, I'm not going to not have the hearing for
8 the two of you. Does that make sense?

9 MR. COLLINS: Yes.

10 MR. WHISENHUNT: Your Honor, even with the
11 two defense theories present, and while they
12 largely do align, I would estimate that if the
13 Court has an hour and a half available on the
14 docket, that may be more prudent so that we're not
15 running up against rushed arguments or risking
16 infringing on someone else's time with the Court.

17 THE COURT: Before I called my judicial
18 assistant about the afternoon of Friday,
19 January 19th, she just emailed me just as I was
20 saying January 19th. I know I have -- or, I'm
21 assuming I have, since my JA was just emailing me,
22 the 19th. How do you all look on the afternoon of
23 the 19th?

24 And, Sarah, I want to reserve two hours.

25 MR. HUFFMAN: That works for the plaintiff,

1 Your Honor.

2 MR. WHISENHUNT: Your Honor, I'm supposed
3 to be getting a capital jury trial in Miami-Dade
4 County beginning on the 16th, so we will be in
5 jury selection on that day. My cocounsel, I
6 believe, can handle that responsibility without my
7 being present, but let me confirm with her. If
8 that's the case, then the 19th would work fine for
9 me, as well.

10 THE COURT: I mean, I'm happy to try to
11 find another day, but it probably will be later in
12 time.

13 MR. WHISENHUNT: I would rather miss a day
14 during the jury selection process than the
15 substantive evidence of that case, so I think that
16 day would probably be the best of my availability
17 until March.

18 THE COURT: When you talk about a death
19 penalty case, I mean, I used to clerk at the
20 Florida Supreme Court, and I just am going to
21 steer away if you have any hesitation about the
22 date.

23 MR. WHISENHUNT: I appreciate that, and if
24 I can have just one moment to clarify?

25 THE COURT: Yes.

1 MR. WHISENHUNT: Your Honor, if I could
2 step out and just make a quick phone call?

3 THE COURT: Yes, you may.

4 MR. WHISENHUNT: Thank you.

5 [PAUSE IN PROCEEDINGS.]

6 MR. WHISENHUNT: Your Honor, provided the
7 Court is willing to allow me to appear by Zoom, I
8 can make sure the 19th would work.

9 THE COURT: Yes, you may.

10 MR. WHISENHUNT: Thank you.

11 THE COURT: So it sounded like both defense
12 lawyers were fine and the plaintiff's lawyer.

13 MR. COLLINS: That's correct.

14 THE COURT: Okay. So what we'll do is we
15 will do a notice of hearing and list all impending
16 motions to dismiss/anti-SLAPP motions.

17 Does any part of this need to be
18 evidentiary, on the SLAPP side?

19 MR. COLLINS: Your Honor, we've submitted a
20 request for judicial notice. To the extent that
21 they're demanding that we present evidence, we'll
22 do it in the form of an affidavit, and that is
23 what's provided for under the SLAPP statute.

24 THE COURT: So I do not need to notice this
25 as an evidentiary hearing; is that correct?

1 MR. COLLINS: That is correct.

2 MR. HUFFMAN: And, Your Honor, since we're
3 resetting this, there was just one more motion
4 pending before the Court. And that's --

5 THE COURT: Let's wait until I finish this
6 issue before we talk about anything else.

7 MR. HUFFMAN: Yes, sir.

8 THE COURT: So I'll get that notice out now
9 when we actually get motions filed. If you can
10 kindly do your notices of hearing with the
11 specific DIN number, the docket identification
12 number, that is on the court docket.

13 Now, Mr. Huffman, what was your next issue?

14 MR. HUFFMAN: Your Honor, we have a motion
15 pending to tax defendant Wilson for the costs of
16 serving him.

17 THE COURT: We're not dealing with that. I
18 mean, we can do that anywhere down at the end of
19 the trial or hearing or wherever it ends up being,
20 right?

21 MR. HUFFMAN: I suppose so. He's trying to
22 get out of the case, so I thought it made sense to
23 have it heard, but whatever Your Honor prefers is
24 fine with us.

25 THE COURT: I don't deal, generally

1 speaking, with collateral motions. I try to get
2 to the heart of the real reason why we're here as
3 quickly as I possibly can.

4 MR. HUFFMAN: Yes, sir.

5 THE COURT: Anything else?

6 MR. HUFFMAN: No, Your Honor.

7 MR. WHISENHUNT: Nothing further from the
8 defense, Your Honor.

9 MR. COLLINS: No, your Honor.

10 THE COURT: So we're on the 19th. I'll do
11 the notice. Okay. 2:00 for two hours. We'll be
12 in recess. Thank you very much.

13 [PROCEEDINGS CONCLUDED AT 2:23 P.M.]

14

15

16

17

18

19

20

21

22

23

24

25

1 CERTIFICATE OF COURT REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF SARASOTA

5

6 I, Lisa M. Plante, Certified Court Reporter and
7 Notary Public in and for the State of Florida, at Large,
8 certify that I was authorized to and did stenographically
9 report the motion hearing before Judge Hunter Carroll on
10 December 19, 2023; and that the transcript is a true and
11 complete record of my stenographic notes.

12

13 I further certify that I am not a relative,
14 employee, attorney, or counsel of any of the parties; nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action; nor am I
17 financially interested in the action.

18

19 DATED this 14th day of April, 2025.

20

21

22

23

24

25



Lisa M. Plante, RPR, FPR-C
LEXITAS Court Reporting
1-800-676-2401
LexitasLegal.com

<hr/> 1 <hr/>	35 5:5	agree 11:23	anti- slapp 8:22 14:24 15:1	<hr/> B <hr/>	16:8,15, 19 18:22
1 5:23	37 5:12	ahead 10:16		based 5:24 6:4,24 10:23	cases 11:22
10 13:20	<hr/> 6 <hr/>	align 15:12	appearan ces 4:9	BEGAN 4:1	CENTER 4:2
16th 16:4	6C 4:2	allegati ons 8:6	Appearin g 4:15,17, 19	beginnin g 16:4	choice 6:3
19 4:3	<hr/> 7 <hr/>	allowing 11:10		behalf 4:15,17, 19 7:24 9:8	circumst ance 8:23
19th 15:19, 20,22,23 16:8 17:8 19:10	768.295 10:18	amend 5:15,20, 23 6:20, 22,23 7:25 8:25 11:15 12:12,16	applicab le 8:10	bring 9:2	circumst ances 14:10
<hr/> 2 <hr/>	<hr/> A <hr/>	amended 5:11 6:13 9:11 10:5 11:10, 11,14 12:4,7, 13 13:11,13 14:14	applies 13:13	Binnall 4:13	cited 5:23
20 13:21	ability 9:2	amendmen t 6:4,21, 25 7:3, 5,17,20 8:7 9:24 10:11,13	apply 8:7	Boatman 4:11	claim 9:15,23
2023 4:3	abuse 10:1		arguing 14:24	burden 9:20,22	clarify 16:24
2023-CA- 4264 4:6	abused 6:22		argument s 15:15		clerk 12:22 16:19
21 4:25	accused 8:12		asserted 7:18	<hr/> C <hr/>	clerk's 13:1
24 13:16,19	added 6:16 14:6		assistan t 15:18	call 17:2	client 8:12,18 11:15,16
2:00 4:3 19:11	addition 6:11		assuming 15:21	called 6:7 15:17	clock 14:16
2:23 19:13	address 10:21,23 14:2		attachme nt 12:21	calling 8:12	cocounse l 16:5
<hr/> 3 <hr/>	affidavi t 17:22		audience 6:17	capital 16:3	collater al 19:1
34 5:2	afternoo n 4:10 9:7 15:18,22	amplifie d 6:15	availabi lity 16:16	case 4:5 5:22 7:4 8:10 9:1 10:14	Collins 4:19,20 7:23 9:10

10:16,17 11:7,11, 14 14:22 15:9 17:13,19 18:1 19:9 communicated 14:2 complaint 5:11,15 6:1,13, 25 7:9 9:1,12 10:6 11:5,7,9 12:7,13 13:11,13 14:12 complaints 7:1 concern 10:21 concerns 14:3 CONCLUDE D 19:13 conclusion 9:2 conduct 6:4 confirm 16:7 contend 7:16	continually 8:25 continue 8:22 continued 6:8 continuing 9:23 control 13:22 correct 9:12 14:7 17:13,25 18:1 costs 18:15 County 16:4 couple 10:13 court 4:5,21 5:12,14, 17,19 7:8,21 8:1,21 9:3 10:4,7, 10,21,25 11:8,12, 19 12:15, 17,20 13:15,18 14:4,5, 11 15:4, 13,16,17 16:10,	18,20,25 17:3,7, 9,11,14, 24 18:4, 5,8,12, 17,25 19:5,10 Court's 5:24 10:24 COURTROOM 4:2 Craig 4:15 9:8 <hr/> D <hr/> date 9:16 12:8 16:22 day 8:13,14, 15 16:5, 11,13,16 days 10:14 11:1,19 12:8,9 13:5,15, 20,21, 23,24 deal 5:14 18:25 dealing 18:17 death 16:18 DECEMBER 4:3	deem 12:17,24 defamation 9:16,18 defamatory 6:9,15 7:14 defendant 5:1,4,6 6:6,14, 15 7:24 8:12 9:15 10:18 13:8 15:6 18:15 defendants 5:25 7:4,6,13 8:23 9:25 14:24 defendants' 14:22 defense 7:22 15:11 17:11 19:8 delay 15:6 demanding 17:21 denies	9:1 deny 7:17 9:3 10:4 detail 9:4 developments 6:24 DIN 4:25 5:2,5,12 18:11 disagree 9:10 dismiss 4:22,24 9:14 11:3 13:10,25 dismiss/anti-slapp 17:16 dismiss/motion 5:2 8:4 9:5 dispose 15:2 docket 4:24 15:14 18:11,12 docketed 12:21 document 12:23	<hr/> E <hr/> early 7:4 efficient t 12:2 elements 7:2 else's 15:16 emailed 15:19 emailing 15:21 employee 8:13 end 5:22 18:18 ends 18:19 enter 14:15 entire 14:19 entitled 8:23 10:18 11:16 estimate 15:12 evidence 16:15 17:21 evidentiary 17:18,25
--	---	---	--	---	--

evolutio n	10:15 12:7,9 13:6,17, 24	Friday 15:18	<hr/> H <hr/>	13:7 15:2,10 16:1,2 17:1,6, 19 18:2, 14,23 19:6,8,9	include 9:14
9:23		frivolou s	half 15:13		incorpor ated 12:13
evolved 13:12	filed 4:25	8:5	handle 16:6		independ ently 9:19
exercise 7:10	5:3,6 6:5,20 12:14, 16,17,24	futile 6:25 7:25	happened 6:5	Honor's 7:11	
existing 7:13		futility 9:10	happy 16:10	hour 14:18 15:3,13	inexpens ive 11:17
expanded 7:15	filing 10:15 13:8	<hr/> G <hr/>	hear 11:8,23 13:18 14:4,11	hours 13:16,19 15:24 19:11	infringi ng 15:16
expedite d 8:24 10:19 11:24	find 13:2 16:11	General 6:9 8:15	heard 18:23	Huffman 4:10,11 5:8,13, 16 10:9 12:11,19 14:8,20 15:25 18:2,7, 13,14,21 19:4,6	initiall y 13:10
explaini ng 8:16	fine 6:3 7:8 13:19 16:8 17:12 18:24	18:25	hearing 5:9,21 8:24 9:5 10:19 11:4,16, 20,21,24 12:3 14:17 15:7 17:15,25 18:10,19		invaded 8:14
extent 17:20		George 4:18			issue 8:2 9:11 14:19 18:6,13
<hr/> F <hr/>	finish 18:5	giving 13:19			issued 8:16
face 8:5	Firm 4:11	good 4:10,14 7:10 9:7			issues 10:21 14:19
fail 9:24	flaws 9:12	granted 6:21 7:6 12:16	heart 19:2	<hr/> I <hr/>	
fails 9:12	Florida 4:2 5:19 16:20	greatly 7:15	hesitati on 16:21	identica l 13:9	<hr/> J <hr/>
faster 11:22	Flynn 4:6 6:9 8:15	grounds 7:17	Honor 4:10,14 5:8,13, 16,18 6:3 7:5, 16,23 9:8 10:9,17 11:17	identifi cation 4:25 18:11	JA 15:21
feel 12:2	folks 10:14	Group 4:13		impending 17:15	January 15:19,20
feels 9:17	form 17:22	guarante ed 9:25		importan t 7:13	Jared 4:12
figure 14:16					Jim 4:6,15, 17 9:8
file 5:10	free 8:19				

joined 6:7	lawsuit 6:5 8:5		14:13	notices 18:10	party 8:25
Jonathan 4:11	9:20,21	M	16:24	number 4:5,25	10:18
Judge 4:1 11:7	lawyer 17:12	made 18:22	months 10:20	11:1	13:14
judgment 4:23	lawyers 17:12	make 7:10	morning 4:14	18:11,12	14:6
5:3,22	lay 8:3	10:16	motion 4:24	O	PAUSE 17:5
8:2,4	leave 5:10,20	11:25	5:2,9,	occurren	penalty 16:19
9:6 11:4	7:19,25	15:8	10,15,	ce 9:16	pending 18:4,15
judicial 4:2,23	12:12,16	17:2,8	21,23	October 6:6	people 6:12
5:6	length 8:16 9:4	makes 8:6	6:19,23	online 6:10	permissi
15:17	Leonard 4:20	manipula	7:25 8:3	operativ	ble 7:17
17:20	liberal 5:20	te 10:2	9:5 10:5	e 11:5,9	permitti
jury 16:3,5,	light 6:1	March 16:17	11:3	14:12	ng 8:25
14	limit 13:20	matter 8:21 9:2	12:12,21	opportun	phone 17:2
justice 10:1	list 17:15	media 6:7	13:9,25	ity 5:25	plainly 7:1 8:8
justific	LLC 14:8	Meidasto	18:3,14	8:3,18	plaintif
ations 8:17	logistic 10:12	uch 6:8 9:19	motions 4:22 6:1	10:22	f 4:8 6:3
K	s 11:17	Miami-	7:7,9	order 14:14	7:8 9:17
kindly 18:10	long 14:9	dade 16:3	9:13	outer 13:20	12:6,12
L	lot 11:22	Michael 4:6 6:9	10:23	P	14:1
largely 15:12	LYNN 4:1	million 6:10	14:3	P.M. 4:3	15:25
larger 6:17		millions 6:12	15:1	19:13	plaintif f's 5:10
late 6:6		miscarri	17:16	part 17:17	6:23
law 4:11,13		age 10:1	18:9	particip	10:5
8:10		missing 5:7	20,24	ant 7:15	14:20
		moment	18:8		17:12
			19:11		plaintif fs 10:8
			noticed 5:9		

platform 6:7,11	proceed 6:2 7:6	<hr/> Q <hr/>	request 5:5 7:19 17:20	Rick 4:7,19 5:4 7:24	11:21
pleading 10:15 11:10,14 12:4,22 13:3 14:15	PROCEEDI NGS 4:1 17:5 19:13	quick 17:2	requeste d 6:24	risking 15:15	setting 11:20
pleading s 12:18, 24,25	process 8:24 10:1,19 16:14	quickly 19:3	requests 4:23	Roberts 4:12	side 7:22 17:18
possibly 19:3	properly 7:1	<hr/> R <hr/>	require 12:23 13:3	Rule 12:14	SILVERTO OTH 4:1
practica l 13:9	proposed 6:25 9:11	raised 9:13 14:3	requisit e 7:2	ruling 5:24 7:8 10:24	similar 6:14,16 7:12
predeces sors 7:2	protecti ons 9:25	reach 7:14	reserve 8:1 15:24	rushed 15:15	simply 9:14 13:14
prefers 18:23	provided 17:6,23	reaches 6:12	resettin g 18:3	Russia 8:14,17	sir 14:8 18:7 19:4
prejudic e 7:3	providin g 8:17	real 19:2	respectf ully 7:19 10:4	<hr/> S <hr/>	sizable 6:7
prepared 14:2	proving 9:21	reason 6:14 12:18 19:2	respond 8:19	Sarah 15:24	SLAPP 11:12 17:18,23
presence 6:11	prudent 15:14	recess 19:12	response 10:7 12:10 13:6	SARASOTA 4:2	sort 11:3 12:9
present 15:11 16:7 17:21	publishe d 6:8	reconnec t 11:3 14:17	responsi bility 16:6	selectio n 16:5,14	sought 5:20 12:14
previous ly 6:13 9:13	purposes 13:9	referenc e 12:13	responsi ve 13:25	sense 15:8 18:22	sounded 17:11
privileg e 6:21	pursuant 9:24	regard 11:15	revisit 5:25	separate 9:15,16	speak 13:8
	pursue 9:18	reject 12:23	Ricci 4:11	serve 14:9	speaking 19:1
	Putin 8:13	repeat 7:10		served 15:7	speciall y 11:21
				serving 18:16	specific 11:1
				set	

18:11 speech 8:19 standalone 12:23 13:3 standard 5:18 standpoint 14:21,23 Starting 4:8 starts 14:16 state 14:5,7 statement 8:16 statements 6:9,16 7:14 8:11 states 7:1 statute 8:22 11:13 17:23 steer 16:21 step 17:2 Stewartson 4:6,15, 18 5:1	6:6 8:8 9:9 13:8,13 Stewartson's 6:15,18 submitted 17:19 substantiated 7:19 substantive 16:15 substantively 13:12 suggests 8:6 summary 4:22 5:3,21 8:4 9:6 11:4 suppose 18:21 supposed 16:2 Supreme 16:20 Surely 9:17 system 9:21 10:2 12:25 13:1	<hr/> T <hr/> talk 10:12 11:5,19, 20 12:24 16:18 18:6 talking 8:11 tax 18:15 theories 15:11 thing 15:4 Thompson 5:22 thought 18:22 Thurlow 4:17,18 time 7:11 10:3 13:16 14:17, 18,25 15:16 16:12 times 12:1 timing 11:6 today 5:24 6:2 7:7 14:3,12, 15,16 today's 12:8	tortious 6:4 trial 16:3 18:19 tweeting 8:13 <hr/> U <hr/> Ukraine 8:15 ultimate 9:24 11:2 underlying 10:23 14:3 understanding 11:12 understanding 4:21 users 6:10 <hr/> V <hr/> version 7:12 <hr/> W <hr/> wait 18:5 waited 10:20	Whisenhuent 4:14,16 9:7,8 13:7,16, 23 15:10 16:2,13, 23 17:1, 4,6,10 19:7 wholly 9:15 Wilson 4:7,20 5:4,6 6:15 7:24 8:8 10:20 18:15 Wilson's 6:17 work 16:8 17:8 works 15:25 worry 14:25 <hr/> Y <hr/> year 6:6 Youtube 6:11 <hr/> Z <hr/> Zoom 17:7
---	---	---	---	--