NO. X06-UWY-CV18-6046436-S	**:**	**SUPERIOR COURT**
ERICA LAFFERTY, ET AL.	**:**	**COMPLEX LITIGATION DOCKET**
V.	**:**	**AT WATERBURY**
ALEX EMRIC JONES, ET AL.	**:**	**OCTOBER 4, 2021**

NO. X06-UWY-CV18-6046437-S	**:**	**SUPERIOR COURT**
WILLIAM SHERLACH	**:**	**COMPLEX LITIGATION DOCKET**
V.	**:**	**AT WATERBURY**
ALEX EMRIC JONES, ET AL.	**:**	**OCTOBER 4, 2021**

NO. X06-UWY-CV18-6046438-S	**:**	**SUPERIOR COURT**
WILLIAM SHERLACH, ET AL.	**:**	**COMPLEX LITIGATION DOCKET**
V.	**:**	**AT WATERBURY**
ALEX EMRIC JONES, ET AL.	**:**	**OCTOBER 4, 2021**

MOTION FOR ADDITIONAL PROTECTIVE MEASURES TO PROTECT PLAINTIFFS' DISCLOSURES (EXPEDITED ADJUDICATION REQUESTED)

The plaintiffs seek the Court's assistance to ensure that their confidential information which has been ordered to be disclosed in this case remains protected.

In the ordinary case, the existing protective order would suffice to ensure the confidentiality of documents claimed as confidential or attorneys-eyes-only. But in this case the Jones defendants flout court orders regularly and opportunistically – and have already invaded the plaintiffs' privacy as described in the operative complaints in these consolidated actions, threatened counsel on air, willfully breached the protective order in a court filing made during the first plaintiff's deposition in this case, and intentionally publicized settlement documents that they

were under court orders not to even possess. Their history of discovery abuse, disregard of the Court's orders, and resistance to the Court's authority fills the docket. To the plaintiffs' great concern, there is no real assurance that the Jones defendants will abide by the terms of the existing protective order, especially if they determine that breaching the protective order will serve them in the press or as a litigation tactic. Moreover, the plaintiffs are concerned that the recent default rulings in Texas and the upcoming sanctions hearing in this case increase the likelihood that the Jones defendants will decide to violate the protective order. For these reasons, the plaintiffs request the expedited entry of a further protective order suspending the plaintiffs' production of confidential and attorneys-eyes-only until a reasonable period after this Court's sanctions order enters, and a further order limiting review of attorneys-eyes-only materials to counsel actually appearing in this Court.

I. RELEVANT FACTS

Operative Protective Order. On February 22, 2019, the Court entered a protective order in this case. DN 185.10, Protec. Order. In relevant part, its purpose was to "protect against disclosure of . . . information affecting the privacy interests of non-parties, which are disclosed during discovery in this case, and to protect the "[p]laintiffs' medical and/or mental health records." DN 185, 2/22/19 Proposed Order. On June 8, 2021, the plaintiffs moved to modify the protective order to create an additional "Attorneys Eyes Only" designation. DN 356, Pls.' Motion to Modify. This designation was justified because the Jones defendants' discovery requests "seek many categories of highly personal information, including the plaintiffs' medical histories, psychiatric records, and information concerning the plaintiffs' private social media accounts." *Id*. at 3. The Court granted the modification on June 16, 2021. DN 368.10, Order.

Willful Violation of Protective Order; Sanction for this Violation Not Yet Imposed. The Jones defendants violated the modified protective order during the first plaintiff's deposition in this case. The Court found, "[i]n the midst of taking the first deposition of a plaintiff, the Jones defendants [except for Alex Jones] . . . filed a motion to depose Hillary Clinton, using deposition testimony that had just been designated as 'Confidential-Attorneys Eyes Only,' and completely disregarding the court ordered procedures." DN 185.10, 2/22/19 Order. They did not take "any steps to correct their improper filing." *Id.* at 2. In doing so, they "blatantly disregard[ed]" the "court ordered procedure" and made "the confidential information available on the internet by filing it in the court file." *Id.*

Seeking to avoid sanctions for their conduct, the Jones defendants took "the absurd position that the court ordered protective order . . . did not need to be complied with, and should not be enforced by the court," a position that the Court correctly characterized as "frightening." *Id.* The Court concluded: "Given the cavalier actions and willful misconduct of Infowars in filing protected deposition information during the actual deposition," it had "grave concerns that their actions, in the future, will have a chilling effect on the testimony of witnesses who would be rightfully concerned that their confidential information, including their psychiatric and medical histories, would be made available to the public." *Id.* The Court stated it would "address sanctions at a future hearing." *Id.* That hearing is now set for October 20, 2021.

Production of Confidential Documents to Begin October 8: Per the operative discovery orders, the plaintiffs will begin production of documents October 8. To comply with the Court's existing discovery orders, the plaintiffs are preparing to include in that production confidential and attorneys-eyes-only emails as well as personal medical records. (This issue remains if the requested extension of time, DN 471, is granted, because the first rolling production will include

confidential and attorneys-eyes-only information.) In addition, the Jones defendants are already in possession of the plaintiffs' confidential information, including interrogatory responses that were produced October 1 and the transcripts of the plaintiffs' deposition testimony.

Recent and Upcoming Sanctions: Multiple cases arising from Alex Jones's promotion of the lie that Sandy Hook was a hoax are pending in the state trial court in Texas. These cases are *Pozner v. Jones, et al.*, (D-1-GN-18-001842); *Lewis v. Jones, et al.* (D-1-GN-18-006623); and *Heslin v. Jones, et al.* (D-1-GN-18-004651). On September 27, 2021, the Texas trial court entered defaults in all the *Pozner* and *Lewis* cases. Ex. A, *Pozner* 9/27/21 Sanctions Order; Ex. B, *Lewis* 9/27/21 Sanctions Order. On September 27, 2021, default entered in the *Heslin* case, Ex. C, *Heslin* 9/27/21 Sanctions Order. The findings of the Texas trial court further document Alex Jones and Free Speech Systems' disregard for court orders.

This Court has not yet sanctioned the Jones defendants for their multiple violations of its orders. However, the issuance of sanctions orders is imminent. On October 1, the Court issued yet another order finding that the Jones defendants had engaged in additional sanctionable conduct and stating that "[i]n light of this continued failure to meet their discovery obligations in violation of the court's order, to the prejudice of the plaintiffs, the court will address the appropriate sanctions at the next status conference." DN 450.20, 9/30/21 Order. The next status conference is October 20.

II. STANDARD FOR ENTRY OF PROTECTIVE ORDER

Practice Book 13-5 permits a court to "make any order which justice requires to protect a party from annoyance, embarrassment, oppression, or undue burden or expense." To obtain a protective order under Conn. Practice Book § 13-5, the defendants must show "good cause." *Welch v. Welch*, 48 Conn. Supp. 19, 20 (Super. Ct. 2003) (quoting Practice Book § 13-5). "Good

cause has been defined as 'a sound basis or legitimate need to take judicial action.'" *Id.* (collecting cases). It "must be based upon a particular and specific demonstration of fact, as distinguished from stereotyped and conclusory statements." Id. (citation omitted). The trial court is vested with the inherent authority to moderate the discovery process by imposing protective orders under appropriate circumstances. *Rosado v. Bridgeport Roman Catholic D*iocesan, 276 Conn. 168, 221 n.59 (2005). It has long been recognized that the granting or denial of a discovery request rests in the sound discretion of the trial court. *Barry v. Quality Steel Products, Inc.*, 280 Conn. 1, 16-17 (2006).

III. A PROTECTIVE ORDER SHOULD BE GRANTED

The Jones defendants have shown show a high degree of contempt for the Court's authority. They have also repeatedly ignored Court orders, taken the actions that they viewed as strategically advantageous and then sought to excuse or justify their conduct.[1] The plaintiffs are concerned that the Court's October 1 ruling finding further non-compliance and scheduling a sanctions hearing for October 20, as well as the recent Texas default rulings, increase the likelihood the Jones defendants will simply disregard the terms of the protective order, if for some reason they determine it advantageous to publicize some aspect of the plaintiffs' confidential information.

The Texas default rulings have been the subject of significant news coverage, including coverage and commentary by Jones himself. Jones has recently made the Texas default rulings – as well as the recent history of this case and the Texas cases – a topic on Infowars.com. According to Media Matters, on October 1, Jones went on air about Sandy Hook, stating:

> Just like the New York Times lying about WMDs on purpose and all of the evil things that – oh but I questioned one of the big events they hyped up because of a

[1] The plaintiffs' multiple motions for sanctions and the Court's rulings on those motions document this conduct; we will not repeat that history here.

> lot of anomalies, and I have a right to question that. In fact, I, for a while, thought it didn't happen, then I thought it probably did, and now seeing how synthetic everything is, maybe my original instinct – maybe Alex Jones is always right. I'm pretty much right 99% of the time, folks, and so are you. I mean we all know, this is easy to look at and see what's happening.

https://www.mediamatters.org/alex-jones/alex-jones-again-suggests-sandy-hook-elementary-school-massacre-was-synthetic-event-im (hard copy of article is attached as Ex. D). Recent statements by Jones underscore the concern that the Jones defendants may respond to the entry of a default as an illegitimate exercise of judicial power and be even less likely to view themselves as bound by the Court's orders. Jones also did a segment of another October 1 show about the Texas rulings, stating at one point, "Every basic form of American liberty is being abolished and overthrown as we speak. They are coming after me because I am standing in their way. They are coming after me because they are coming after you." https://banned.video/watch?id=61566ecd39352e25909cc8b6 at 0:16-0:38. Jones called the judge who entered the Texas default orders "a bombthrower" and "unbelievably ill-informed about the law." *Id.* at 6:29. He said of both cases, "they are not going to give us a fair trial." *Id.* at 9:23.[2] Later on, Jones hosted Attorney Pattis on the show. Jones commented, "They know they don't have the case they claim, so I don't get to have a jury. I don't think America is going to put up with that." Attorney Pattis responded, "I hope you are right but I think we have thus far. I think it's time for we the people to stand up and say we're mad as hell and we're not going to take it any more." *Id.* at 80:45-81:05.

We emphasize that the record fully supports the entry of the requested relief – without consideration of Jones' and Pattis' recent remarks. However, these remarks raise the plaintiffs' counsels' concerns, and we therefore bring them to the Court's attention.

[2] Given the need to file this Motion today, there was not time to prepare a transcript of these broadcasts.

For all these reasons, the plaintiffs request the following relief:

1) That the Court suspend the plaintiffs' obligation to produce confidential and attorneys-eyes-only designated information until three weeks after the entry of any sanctions order, so that if the Court enters a sanction that affects production, production can be re-formulated, and so that there is a cooling off period between the entry of the sanction and the availability of the plaintiffs' confidential documents;
2) That attorneys-eyes-only designated material be restricted to attorneys who are appearing before the Court in Connecticut: Attorneys Pattis, Wolman, and Atkinson for the Jones defendants, and Attorney Mario Cerame for Genesis. The purpose of this request is to ensure complete accountability for any breaches of the protective order's protections for attorneys-eyes-only materials.
3) Such other relief as the Court may deem appropriate, given the concerns raised in this Motion.

THE PLAINTIFFS,

By: */s/ Alinor C. Sterling*
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CERTIFICATION

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and *pro se* appearances as follows:

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/s/ Alinor C. Sterling
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EXHIBIT A

D-1-GN-18-001842

LEONARD POZNER AND VERONIQUE DE LA ROSA *Plaintiffs*	§ § §	IN DISTRICT COURT OF
VS.	§	TRAVIS COUNTY, TEXAS
ALEX E. JONES, INFOWARS, LLC, AND FREE SPEECH SYSTEMS, LLC, *Defendants*	§ § §	459th DISTRICT COURT

ORDER ON PLAINTIFFS' MOTION TO COMPEL AND MOTION FOR SANCTIONS

On this day, the Court considered Plaintiffs' Motion to Compel and Motion for Sanctions. The Court finds that the motions should be granted.

BACKGROUND

On May 29, 2018, Plaintiffs served written discovery on Defendant Free Speech Systems, LLC. Twenty-eight days after service of the requests, Defendants filed a TCPA Motion, which was subsequently denied and appealed. Following remand, Defendants failed to provide responses.

One month after remand, on July 2, 2021, Plaintiffs wrote to the Defendants inquiring about the overdue responses. Plaintiffs offered an additional 14 days for Defendants to provide responses, in which case Plaintiffs agreed to waive any complaint about their timeliness. That same day, Defendants' counsel requested that Plaintiffs' counsel provide a copy of the *Pozner* discovery requests. More than three

weeks later, on July 27, 2021, with no responses provided, Plaintiffs brought the instant motion. Defendants have never answered the discovery requests.

FINDINGS

The Court find that Defendants unreasonably and vexatiously failed to comply with their discovery duties. The Court finds that Defendants' failure to comply with discovery in this case is greatly aggravated by Defendants' consistent pattern of discovery abuse throughout the other similar cases pending before this Court. Prior to this latest discovery failure, Defendants repeatedly violated this Court's discovery orders in *Lewis v. Jones, et al.* (D-1-GN-18-006623), *Heslin v. Jones, et al.* (D-1-GN-18-001835), and *Heslin v. Jones, et al.*[1] (D-1-GN-18-004651), all of which are related cases involving Defendants' publications about the Sandy Hook Elementary School shooting. Defendants also failed to timely answer discovery in *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605), a similar defamation lawsuit involving Defendants' publications about the Stoneman Douglas High School shooting. The Court also notes that Defendants have repeatedly violated discovery orders in *Lafferty v. Jones,* a similar defamation lawsuit brought by a different set of Sandy Hook parents in the Superior Court of Connecticut. The Court finds that Defendants' discovery conduct in this case is the result of flagrant bad faith and callous disregard for the responsibilities of discovery under the rules.

[1] Subsequently consolidated with D-1-GN-18-001835.

It is clear to the Court that discovery misconduct is properly attributable to the client and not the attorney, especially since Defendants have been represented by seven attorneys over the course of the suit. Regardless of the attorney, Defendants' discovery abuse remained consistent.

For these reasons, it is accordingly ORDERED that sanctions be assessed Defendants, including the following remedies allowed under Rule 215:

( ) an order disallowing any further discovery of any kind by the Defendants.

( ) an order charging all of the expenses of discovery or taxable court costs against the Defendants;

( ) an order that the matters regarding which the order was made or any other designated facts shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order; to wit,

_____

_____

_____.

( ) an order refusing to allow the Defendants to support or oppose designated claims or defenses, or prohibiting them from introducing designated matters in evidence.

(X) a judgment by default against the Defendants, as this Court has considered less sanctions and determined they would be inadequate to cure the

violation in light of the history of Defendants' conduct in this Court. In reaching its decision, this Court has considered lesser remedies before imposing sanctions that preclude Defendants' ability to present the merits of their liability defense. However, the Court has more than a sufficient record to conclude that an escalating series of judicial admonishments, monetary penalties, and non-dispositive sanctions have all been ineffective at deterring the abuse. This Court rejects lesser sanctions because they have proven ineffective when previously ordered. They would also benefit Defendants and increase the costs to Plaintiffs, and they would not adequately serve to correct the Defendants' persistent discovery abuses. Furthermore, in considering whether lesser remedies would be effective, this Court has also considered Defendants' general bad faith approach to litigation, Mr. Jones' public threats, and Mr. Jones' professed belief that these proceedings are "show trials."

It is further ORDERED that Defendants shall pay reasonable attorney's fees in connection with Plaintiffs' Motion. Plaintiffs shall submit evidence regarding the reasonable value of the time expended by their attorneys related to their Motion.

Dated September 27, 2021.

Hon. Maya Guerra Gamble

EXHIBIT B

D-1-GN-18-006623

SCARLETT LEWIS *Plaintiff*	§	IN DISTRICT COURT OF
VS.	§	TRAVIS COUNTY, TEXAS
ALEX E. JONES, INFOWARS, LLC, AND FREE SPEECH SYSTEMS, LLC, *Defendants*	§	459th DISTRICT COURT

ORDER ON PLAINTIFF'S MOTION FOR CONTEMPT

On this day, the Court considered Plaintiff's Motion for Contempt. The Court finds that the motion should be granted.

BACKGROUND

On January 25, 2019, this Court ordered Defendants to respond to court-approved discovery requests by February 25, 2019 and appear for depositions by March 25, 2019. Defendants refused to provide any documents, citing the reporter's privilege. In an order on March 8, 2019, this Court ordered Defendants to immediately produce all responsive documents. Thereafter, Defendants failed to produce any documents or prepare their corporate representative for deposition. After Defendants failed to comply with the discovery order, Plaintiff brought a motion for sanctions. A few days prior to the sanctions hearing on April 3, 2019, Defendants provided a set of documents. However, Defendants' counsel admitted at the hearing that the documents were incomplete and not sufficient. Defendants' counsel agreed

to pay $8,100 in attorney's fees and abandoned Defendants' TCPA arguments except for a sole legal issue to avoid being sanctioned at that time.

Defendants then unsuccessfully appealed the Court's denial on the TCPA motion. Following remand on June 4, 2021, Defendants took no action to comply with the January 25 discovery order, or any of the Court's other discovery orders, for over a month. Plaintiff then filed her Motion for Contempt under Rule 215 on July 6, 2021. Even after that motion was filed, Defendants continued to withhold discovery through July and August.

On August 26, 2021, a few days before the hearing on this matter, Defendants provided some additional documents to Ms. Lewis, but it is clear these documents do not satisfy Defendants' outstanding obligations. In addition, Defendants did not provide any supplemental discovery responses, nor did Defendants make efforts for a corporate representative deposition to cure their non-appearance. Nor have the Defendants fully and fairly responded to the discovery requests at issue.

FINDINGS

This Court finds that Defendants have intentionally disobeyed the Court's order. The Court also finds that Defendants' failure to comply with the discovery order in this case is greatly aggravated by Defendants' consistent pattern of discovery abuse throughout the other similar cases pending before this Court. Defendants violated this Court's discovery orders in *Heslin v. Jones, et al.* (D-1-GN-18-001835) and

Heslin v. Jones, et al.[1] (D-1-GN-18-004651), both of which are related cases involving Defendants' publications about the Sandy Hook Elementary School shooting. Defendants also failed to timely answer discovery in *Pozner v. Jones, et al.* (D-1-GN-18-001842), another Sandy Hook lawsuit, as well as *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605), a similar lawsuit involving Defendants' publications about the Stoneman Douglas High School shooting. The Court also notes that Defendants have repeatedly violated discovery orders in *Lafferty v. Jones,* a similar lawsuit brought by a different set of Sandy Hook parents in the Superior Court of Connecticut. The Court finds that Defendants' discovery conduct in this case is the result of flagrant bad faith and callous disregard for the responsibilities of discovery under the rules.

It is clear to the Court that discovery misconduct is properly attributable to the client and not the attorney, especially since Defendants have been represented by seven attorneys over the course of the suit. Regardless of the attorney, Defendants' discovery abuse remained consistent.

It is accordingly ORDERED that sanctions be assessed Defendants, including the following remedies allowed under Rule 215:

( ) an order disallowing any further discovery of any kind by the Defendants.

( ) an order charging all of the expenses of discovery or taxable court costs against the Defendants;

---

[1] Subsequently consolidated with D-1-GN-18-001835.

( ) an order that the matters regarding which the order was made or any other designated facts shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order; to wit:

_____

_____

_____.

( ) an order refusing to allow the Defendants to support or oppose designated claims or defenses, or prohibiting them from introducing designated matters in evidence; to wit: _____

_____

_____.

[X] a judgment by default against the Defendants, as this Court has considered lesser sanctions and determined they would be inadequate to cure the violation in light of the history of Defendants' conduct in this Court. In reaching its decision, this Court has considered lesser remedies before imposing sanctions that preclude Defendants' ability to present the merits of their liability defense. However, the Court has more than a sufficient record to conclude that an escalating series of judicial admonishments, monetary penalties, and non-dispositive sanctions have all been ineffective at deterring the abuse. This Court rejects lesser sanctions because they have proven ineffective when previously ordered. They would also benefit Defendants and increase the costs to Plaintiffs, and they would not adequately serve

to correct the Defendants' persistent discovery abuses. Furthermore, in considering whether lesser remedies would be effective, this Court has also considered Defendants' general bad faith approach to litigation, Mr. Jones' public threats, and Mr. Jones' professed belief that these proceedings are "show trials."

It is further ORDERED that Defendants shall pay reasonable attorney's fees in connection with Plaintiff's Motion. Plaintiff shall submit evidence regarding the reasonable value of the time expended by her attorneys related to her Motion.

Dated September 27, 2021.

Hon. Maya Guerra Gamble

EXHIBIT C

D-1-GN-18-001835

NEIL HESLIN *Plaintiff*	§	IN DISTRICT COURT OF
VS.	§	TRAVIS COUNTY, TEXAS
ALEX E. JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER *Defendants*	§	459th DISTRICT COURT

ORDER ON PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

On this day, the Court considered Neil Heslin's Motion for Default Judgment. The Court finds that the Motion should be granted.

BACKGROUND

On October 18, 2019, this Court ordered expedited discovery in Mr. Heslin's IIED claim, including written discovery and depositions. Defendants failed to comply with the order in numerous respects. On December 20, 2019, the Court assessed sanctions and held the Defendants in contempt for intentionally disobeying the order. At that time, the Court took under advisement all additional remedies based on representations by Defendants that discovery would be promptly supplemented during the appellate stay. As the Court stated in its prior order, the amount of supplemental discovery would be a factor when revisiting sanctions upon remand. Despite their promises, Defendants failed to supplement any discovery following the

2019 hearing and prior to remand. Defendants also failed to supplement any discovery for nearly three months following remand in June 2021.

On August 26, 2021, a few days before the hearing on this matter, Defendants provided some additional documents to Mr. Heslin, but it is clear these documents do not satisfy Defendants' outstanding obligations. In addition, Defendants did not provide any supplemental discovery responses, nor did Defendants make efforts for a corporate representative deposition to cure their non-appearance. Nor have the Defendants fully and fairly responded to the discovery requests at issue.

FINDINGS

The Court now finds that a default judgment on liability should be granted. The Court finds that Defendants' discovery conduct in this case has shown flagrant bad faith and callous disregard for the responsibilities of discovery under the rules. The Court finds Defendants' conduct is greatly aggravated by the consistent pattern of discovery abuse throughout the other Sandy Hook cases pending before this Court. Prior to the discovery abuse in this case, Defendants also violated this Court's discovery orders in *Lewis v. Jones, et al.* (D-1-GN-18-006623) and *Heslin v. Jones, et al.* (D-1-GN-18-001835). After next violating the October 18, 2019 discovery order in this case, Defendants also failed to timely answer discovery in *Pozner v. Jones, et al.* (D-1-GN-18-001842), another Sandy Hook lawsuit, as well as *Fontaine v. InfoWars, LLC, et al.* (D-1-GN-18-1605), a similar lawsuit involving Defendants' publications about the Stoneman Douglas High School shooting. The Court also notes that

Defendants have repeatedly violated discovery orders in *Lafferty v. Jones*, a similar defamation lawsuit brought by a different set of Sandy Hook parents in the Superior Court of Connecticut. In sum, Defendants have been engaged in pervasive and persistent obstruction of the discovery process in general. The Court is also faced with Defendants' refusal to produce critical evidence. Defendants have shown a deliberate, contumacious, and unwarranted disregard for this Court's authority. Based on the record before it, this Court finds that Defendants' egregious discovery abuse justifies a presumption that its defenses lack merit.

In reaching its decision, this Court has considered lesser remedies before imposing sanctions that preclude Defendants' ability to present the merits of their liability defense. However, the Court has more than a sufficient record to conclude that an escalating series of judicial admonishments, monetary penalties, and non-dispositive sanctions have all been ineffective at deterring the abuse. This Court rejects lesser sanctions because they have proven ineffective when previously ordered. They would also benefit Defendants and increase the costs to Plaintiffs, and they would not adequately serve to correct the Defendants' persistent discovery abuses. Furthermore, in considering whether lesser remedies would be effective, this Court has also considered Defendants' general bad faith approach to litigation, Mr. Jones' public threats, and Mr. Jones' professed belief that these proceedings are "show trials."

and determined they would be inadequate in light of the history of Defendants' conduct in this Court.

It is clear to the Court that discovery misconduct is properly attributable to the client and not the attorney, especially since Defendants have been represented by seven attorneys over the course of the suit. Regardless of the attorney, Defendants' discovery abuse remained consistent.

It is accordingly ORDERED that a default judgment be entered against Defendants with respect to liability in this lawsuit.

It is further ORDERED that Defendants shall pay reasonable attorney's fees in connection with Plaintiffs' Motion. Plaintiffs shall submit evidence regarding the reasonable value of the time expended by their attorneys related to their Motion for Default Judgment subsequent to the December 2019 hearing in this matter.

Dated September 27, 2021.

Hon. Maya Guerra Gamble

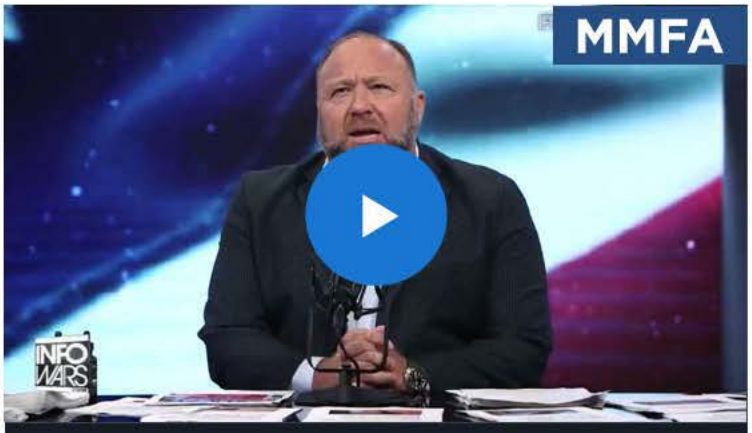
EXHIBIT D

MEDIAMATTERS
FOR AMERICA

Alex Jones again suggests the Sandy Hook Elementary School massacre was a "synthetic" event: "I'm pretty much right 99% of the time"

WRITTEN BY MEDIA MATTERS STAFF

PUBLISHED 10/01/21 2:34 PM EDT



From the October 1, 2021, edition of Infowars' *The Alex Jones Show*

ALEX JONES (HOST): Just like the New York Times lying about WMDs on purpose and all of the evil things that -- oh, but I questioned one of the big events they hyped up because of a lot of the anomalies, and I have a right to question that. In fact, I, for a while, thought it didn't happen, then I thought it probably did, and now seeing how synthetic everything is, maybe my original instinct -- maybe Alex Jones is always right. I'm pretty much right 99% of the time, folks, and so are you. I mean we all know, this is easy to look at and see what's happening.