

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION

ERICA LAFFERTY; DAVID WHEELER;  
FRANCINE WHEELER; JACQUELINE  
BARDEN; MARK BARDEN; NICOLE  
HOCKLEY; IAN HOCKLEY; JENNIFER  
HENSEL; JEREMY RICHMAN; DONNA  
SOTO; CARLEE SOTO-PARISI; CARLOS  
M. SOTO; JILLIAN SOTO; AND WILLIAM  
ALDENBERG,

Plaintiffs,

v.

ALEX EMRIC JONES; INFOWARS, LLC;  
FREE SPEECH SYSTEMS, LLC;  
INFOWARS HEALTH, LLC; PRISON  
PLANET TV, LLC; WOLFGANG  
HALBIG; CORY T. SKLANKA; GENESIS  
COMMUNICATIONS NETWORK, INC.;  
and MIDAS RESOURCES, INC.,

Defendants.

ADV. PROC. NO. 22 - \_\_\_\_\_

AUGUST 2, 2022

**NOTICE OF REMOVAL TO BANKRUPTCY COURT**

Defendant Free Speech Systems, LLC ("FSS"), pursuant to 28 U.S.C. §§ 1334 and 1452, Federal Rule of Bankruptcy Procedure 9027, and Local Rule of Bankruptcy Procedure 9027-1, hereby files this Notice of Removal of Case No. X06-UWY-CV-18-6046436-S, from the Superior Court, Judicial District of Fairfield at Bridgeport, Connecticut (the "State Court"), where this action was commenced, to this Court. As grounds for such removal, the Debtor state as follows:

1. On or about May 23, 2018, Plaintiffs Erica Lafferty, David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Jeremy Richman, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto, and William Aldenberg

filed this action in the State Court, thus initiating the "State Court Lawsuit." The State Court Lawsuit names the Debtor as a defendant.

2. On July 29, 2022 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Victoria Division, pending as *In re: Free Speech Systems, LLC*; Case No. 22-60043.

3. The Debtor timely files this Notice of Removal within 90 days of the Petition Date pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(2).

4. The United States District Court for the District of Connecticut has original jurisdiction over this action pursuant to 28 U.S.C. §1334(b) as the State Court Lawsuit is "related to" the bankruptcy case. Additionally, there the diversity jurisdiction under 28 U.S. Code § 1332.

5. Removal to this Bankruptcy Court is proper pursuant to 28 U.S.C. § 1452, Federal Rule of Bankruptcy Procedure 9027, and Local Bankruptcy Rule 9027-1. The State Court Lawsuit was filed in state of Connecticut and was proceeding in the Superior Court, Judicial District of Fairfield at Bridgeport, Connecticut. The U.S. District Court for the District of Connecticut, Bridgeport Division, is the United States district and division appropriate for removal of the State Court Lawsuit.

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DEFENDANT FREE SPEECH SYSTEMS, LLC

By: /s/ Norman A. Pattis /s/

Norman A. Pattis

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