

AUG 31 2018 JC
At 2:58 P.M.
Velva L. Price, District Clerk

CAUSE NO. D-1-GN-18-001835

NEIL HESLIN
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

§
§
§
§
§
§
§
§

IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

53rd DISTRICT COURT

**ORDER ON PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY IN AID OF
PLAINTIFF'S RESPONSE TO DEFENDANTS' TCPA MOTION**

Having considered Plaintiff's Motion for Expedited Discovery, the Court finds that there is good cause to grant the Motion, and hereby ORDERS that:


1. Plaintiff's Motion is GRANTED. After considering the pleadings and arguments of counsel, the Court rules that Plaintiff may serve the written discovery attached as Exhibit 1 to this Order, and that Plaintiff may take the following depositions: Alex Jones, InfoWars LLC, Free Speech Systems LLC, and Owen Shroyer.

2. Defendants shall respond to written discovery within 30 days of service.

3. Depositions shall be completed no later than October 22, 2018. Each deposition shall last no more than 2.5 hours.

4. As authorized by Tex. Civ. Prac. & Rem. Code Sec. 27.004, the court will "extend the hearing date to allow discovery." Oral hearing on Defendants' Motion to Dismiss under the Texas Citizen's Participation Act is recessed and extended until November 1, 2018, which is less than 120 days after the service of the motion under Tex. Civ. Prac. & Rem. Code Sec. 27.003.

So ORDERED this 31st day of August, 2018.



Scott Jenkins
Travis County District Judge

Respectfully submitted and entry requested,

FARRAR & BALL, LLP



MARK D. BANKSTON
State Bar No. 24071066
KYLE W. FARRAR
State Bar No. 24034828
WILLIAM R. OGDEN
State Bar No. 24073531
1010 Lamar, Suite 1600
Houston, Texas 77002
713.221.8300 Telephone
713.221.8301 Fax

EXHIBIT 1

Court Approved Written Discovery

NEIL HESLIN
Plaintiff

§
§
§
§
§
§
§
§
§

IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

261st DISTRICT COURT

**PLAINTIFF'S REQUESTS FOR ADMISSIONS, REQUESTS FOR INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO DEFENDANT, ALEX E. JONES**

TO: Defendant, Alex E. Jones, by and through his attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Neil Heslin, Plaintiff, in the above-styled and numbered cause, and serves the following Requests for Admissions, Requests for Interrogatories and Requests for Production to Defendant, Alex E. Jones, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

KASTER LYNCH FARRAR & BALL, LLP



MARK D. BANKSTON
State Bar No. 24071066
mark@fbtrial.com
KYLE W. FARRAR
State Bar No. 24034828
WILLIAM R. OGDEN

State Bar No. 24073531
1010 Lamar, Suite 1600
Houston, Texas 77002
713.221.8300 Telephone
713.221.8301 Fax

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this 31st day of August, 2018 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

Via E-Service: fly63rc@verizon.net

Mark C. Enoch
Glast, Phillips & Murray, P.C.
14801 Quorum Drive, Ste. 500
Dallas, Texas 75254



MARK D. BANKSTON

DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession.
2. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession.
3. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. “Instant messenger logs” means any written or electronic records reflecting the content of any online chat that offers real-time text transmission over the Internet.
5. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS
TO DEFENDANT ALEX E. JONES**

REQUEST FOR ADMISSION NO. 1: Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that as of June 26, 2017, you had the right to direct or control the work performed by employees of Free Speech Systems, LLC and InfoWars, LLC.

RESPONSE:

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT ALEX E. JONES**

INTERROGATORY NO. 1: Describe your job duties, responsibilities, and authority with Free Speech Systems, LLC as of June 26, 2017.

ANSWER:

INTERROGATORY NO. 2: Describe your job duties, responsibilities, and authority with InfoWars, LLC as of June 26, 2017.

ANSWER:

INTERROGATORY NO. 3: Describe your education and training in journalism.

ANSWER:

INTERROGATORY NO. 4: Describe your process for ensuring that factual assertions made in InfoWars programming are vetted for accuracy as of June 26, 2017.

ANSWER:

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
TO DEFENDANT ALEX E. JONES**

REQUEST FOR PRODUCTION NO. 1: All communications, including letters, memoranda, emails, text messages, instant messenger logs, or other electronic communications in which the follow topics are referenced:

- a) Neil Heslin or his son
- b) Dr. Wayne Carver
- c) Zero Hedge
- d) Jim Fetzer

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: All documents or communications relating to the June 26, 2017 YouTube video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece" or the episode of InfoWars programming it originated from.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on June 18, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on April 19, 2018.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All communications between you and Owen Shroyer, InfoWars, LLC, or Free Speech Systems, LLC, or anyone acting on their behalf, regarding policies and procedures for the factual vetting for reporting on InfoWars programming.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All communications between you and Owen Shroyer, InfoWars, LLC, or Free Speech Systems, LLC, or anyone acting on their behalf, regarding Megyn Kelly.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: All contracts between you, Owen Shroyer, InfoWars, LLC, or Free Speech Systems, LLC.

RESPONSE:

CAUSE NO. 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

261st DISTRICT COURT

VERIFICATION

STATE OF TEXAS

§
§
§

COUNTY OF _____

BEFORE ME, the undersigned notary public, on this day personally appeared ALEX E. JONES, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

ALEX E. JONES

SUBSCRIBED AND SWORN TO BEFORE ME, this the _____ day of _____, 2018.

Notary Public in and for the State of Texas

My Commission Expires:

CAUSE NO. D-1-GN-18-001835

NEIL HESLIN
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

§
§
§
§
§
§
§
§
§

IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261st DISTRICT COURT

**PLAINTIFF'S REQUESTS FOR ADMISSIONS, REQUESTS FOR INTERROGATORIES
AND REQUESTS FOR PRODUCTION TO DEFENDANT, OWEN SHROYER**

TO: Defendant, Owen Shroyer, by and through his attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Neil Heslin, Plaintiff, in the above-styled and numbered cause, and serves the following Requests for Admissions, Requests for Interrogatories and Requests for Production to Defendant, Owen Shroyer, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

KAster LYNCH FARRAR & BALL, LLP



MARK D. BANKSTON
State Bar No. 24071066

mark@fbtrial.com
KYLE W. FARRAR
State Bar No. 24034828
WILLIAM R. OGDEN
State Bar No. 24073531
1010 Lamar, Suite 1600
Houston, Texas 77002
713.221.8300 Telephone
713.221.8301 Fax

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this 31st day of August, 2018 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

Via E-Service: fly63rc@verizon.net

Mark C. Enoch
Glast, Phillips & Murray, P.C.
14801 Quorum Drive, Ste. 500
Dallas, Texas 75254



MARK D. BANKSTON

DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. "Communication" as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession.
2. "Document" as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession.
3. "InfoWars," generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. "Instant messenger logs" means any written or electronic records reflecting the content of any online chat that offers real-time text transmission over the Internet.
5. "Video" as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS
TO DEFENDANT OWEN SHROYER**

REQUEST FOR ADMISSION NO. 1: Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that on June 25-26, 2017, you knew it was possible that Neil Heslin held his dead son and saw a bullet wound to his forehead.

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that on June 25-26, 2017, you had no legitimate basis to claim it was impossible for Neil Heslin to have held his dead son and saw a bullet wound to his forehead.

RESPONSE:

REQUEST FOR ADMISSION NO. 4: Admit that as of June 26, 2017, you were employed by Free Speech Systems, LLC.

RESPONSE:

REQUEST FOR ADMISSION NO. 5: Admit that as of June 26, 2017, Alex Jones had the right to direct or control the work you perform.

RESPONSE:

REQUEST FOR ADMISSION NO. 6: Admit that as of June 26, 2017, agent(s) of InfoWars, LLC had the right to direct or control the work you perform.

RESPONSE:

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT OWEN SHROYER**

INTERROGATORY NO. 1: Identify every step you took in assessing the credibility of Jim Fetzer.

ANSWER:

INTERROGATORY NO. 2: Identify every step you took in assessing the credibility of Zero Hedge.

ANSWER:

INTERROGATORY NO. 3: Describe your education and training in journalism.

ANSWER:

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
TO DEFENDANT OWEN SHROYER**

REQUEST FOR PRODUCTION NO. 1: All communications, including letters, memoranda, emails, text messages, instant messenger logs, or other electronic communications in which the follow topics are referenced:

- a) Neil Heslin or his son
- b) Dr. Wayne Carver
- c) Zero Hedge
- d) Jim Fetzer

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: All documents or communications relating to the June 26, 2017 YouTube video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece" or the episode of InfoWars programming it originated from.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on June 18, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on April 19, 2018.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All communications between you and Alex Jones, InfoWars, LLC, or Free Speech Systems, LLC, or anyone acting on their behalf, regarding policies and procedures for the factual vetting for reporting on InfoWars programming.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All communications between you and Alex Jones, InfoWars, LLC, or Free Speech Systems, LLC, or anyone acting on their behalf, regarding Megyn Kelly.

RESPONSE:

CAUSE NO. 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

261st DISTRICT COURT

VERIFICATION

STATE OF TEXAS

§
§
§

COUNTY OF _____

BEFORE ME, the undersigned notary public, on this day personally appeared OWEN SHROYER, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

OWEN SHROYER

SUBSCRIBED AND SWORN TO BEFORE ME, this the _____ day of _____, 2018.

Notary Public in and for the State of Texas

My Commission Expires:

CAUSE NO. 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

261st DISTRICT COURT

**PLAINTIFF’S REQUESTS FOR ADMISSIONS, REQUESTS FOR INTERROGATORIES
AND REQUESTS FOR PRODUCTION TO DEFENDANT, FREE SPEECH SYSTEMS, LLC**

TO: Defendant, Free Speech Systems, LLC, by and through its attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Neil Heslin, Plaintiff, in the above-styled and numbered cause, and serves the following Requests for Admissions, Requests for Interrogatories and Requests for Production to Defendant, Free Speech Systems, LLC, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

KAster LYNCH FARRAR & BALL, LLP



MARK D. BANKSTON
State Bar No. 24071066
mark@fbtrial.com

KYLE W. FARRAR
State Bar No. 24034828
WILLIAM R. OGDEN
State Bar No. 24073531
1010 Lamar, Suite 1600
Houston, Texas 77002
713.221.8300 Telephone
713.221.8301 Fax

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this 31st day of August, 2018 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

Via E-Service: fly63rc@verizon.net

Mark C. Enoch
Glast, Phillips & Murray, P.C.
14801 Quorum Drive, Ste. 500
Dallas, Texas 75254



MARK D. BANKSTON

DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession, including communications in the custody of any employee or agent of Free Speech Systems LLC.
2. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession, including documents in the custody of any employee or agent of Free Speech Systems LLC.
3. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. “Instant messenger logs” means any written or electronic records reflecting the content of any online chat that offers real-time text transmission over the Internet.
5. “Organizational chart” means a diagram that shows the structure of an organization and the relationships and relative ranks of its parts and positions/jobs.
6. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

REQUEST FOR ADMISSION NO. 1: Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that on June 26, 2017, Free Speech Systems, LLC knew it was possible that Neil Heslin held his dead son and saw a bullet wound to his forehead.

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that Free Speech Systems, LLC was involved in the creation, research, editing, marketing, funding, staffing, distribution, or publication of the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece."

RESPONSE:

REQUEST FOR ADMISSION NO. 4: Admit that Free Speech Systems, LLC possesses intellectual property rights and copyright over the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece."

RESPONSE:

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

INTERROGATORY NO. 1: Identify all persons answering or supplying information used in answering these discovery requests and identify their job duties at Free Speech Systems, LLC.

ANSWER:

INTERROGATORY NO. 2: Identify every employee or agent of Free Speech Systems, LLC who was involved in the creation, research, editing, marketing, funding, distribution, or publication of the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece," and describe their specific role.

ANSWER:

INTERROGATORY NO. 3: For each person who had ownership interest in Free Speech Systems, LLC on June 26, 2017, state:

- a) their full name
- b) the date(s) upon which the person acquired their ownership interest.
- c) the kind of consideration paid or promised for the ownership interest and the date(s) on which it was paid or promised.
- d) the percentage of that individual's ownership interest.
- e) whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer, or director of Free Speech Systems, LLC, and, if so, the identity of the other person and the nature of the relationship.

ANSWER:

INTERROGATORY NO. 4: Identify each person who has served as an officer, director, or management-level employee of Free Speech Systems, LLC at any time during the past five years.

ANSWER:

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

REQUEST FOR PRODUCTION NO. 1: A copy of all documents relating to Sandy Hook which have been deleted or removed from public availability since the inception of this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: All documents or communications which reference the following topics:

- a) Neil Heslin or his son
- b) Dr. Wayne Carver
- c) Zero Hedge
- d) ZeroPointNow
- e) iBankCoin.com
- f) Jim Fetzer

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Transcripts of all InfoWars videos in which the Plaintiff is discussed.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: A copy of all articles featuring Sandy Hook posted on a website operated under the brand name "InfoWars" from December 14, 2012 to June 25, 2018.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All documents or communications relating to the June 26, 2017 YouTube video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece" or the episode of InfoWars programming it originated from.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All documents or communications relating to the July 20, 2017 video in which the June 26 video featuring Mr. Shroyer was re-published.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on June 18, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: All documents or communications relating to Neil Heslin's interview with Megyn Kelly on April 19, 2018.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: All documents relating to disciplinary or corrective actions taken against any employee or agent of InfoWars due to the publication of false or incorrect information during the past ten years.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: All documents used to train or instruct InfoWars' employees of the vetting of factual information for publication, as in effect on June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: All documents reflecting policies for the factual vetting of information published by InfoWars, as in effect on June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: All documents setting forth InfoWars' editorial standards or guidelines, as in effect on June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: All documents setting forth InfoWars' prior or superseded editorial standards or guidelines, as in effect between December 14, 2012 and June 25, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: All documents setting forth InfoWars' disciplinary rules or code of conduct for reporters and editorial staff, as in effect on June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: All documents setting forth InfoWars' prior or superseded disciplinary rules or code of conduct for reporters and editorial staff, as in effect between December 14, 2012 and June 25, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: Owen Shroyer's employment agreement.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17: An organizational chart for Free Speech Systems, LLC as of June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18: All documents or communications reflecting the ownership of The Alex Jones Show, InfoWars.com, the InfoWars' brand, and its related intellectual property from 2017 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19: All contracts in effect between Free Speech Systems, LLC and InfoWars, LLC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20: All incorporating documents for Free Speech Systems, LLC, including article of incorporation, bylaws, certificate of incorporation, and notice of incorporation.

RESPONSE:

CAUSE NO. 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

261st DISTRICT COURT

VERIFICATION

STATE OF TEXAS

§
§
§

COUNTY OF _____

BEFORE ME, the undersigned notary public, on this day personally appeared _____, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME, this the _____ day of _____, 2018.

Notary Public in and for the State of Texas

My Commission Expires:

CAUSE NO. D-1-GN-18-001835

NEIL HESLIN
Plaintiff

VS.

ALEX E. JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC, and
OWEN SHROYER,
Defendants

§
§
§
§
§
§
§
§
§

IN DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261st DISTRICT COURT

**PLAINTIFF'S REQUESTS FOR ADMISSIONS, REQUESTS FOR INTERROGATORIES
AND REQUESTS FOR PRODUCTION TO DEFENDANT, INFOWARS, LLC**

TO: Defendant, InfoWars, LLC, by and through its attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Neil Heslin, Plaintiff, in the above-styled and numbered cause, and serves the following Requests for Admissions, Requests for Interrogatories and Requests for Production to Defendant, InfoWars, LLC, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

KASTER LYNCH FARRAR & BALL, LLP



MARK D. BANKSTON
State Bar No. 24071066
mark@fbtrial.com

KYLE W. FARRAR
State Bar No. 24034828
WILLIAM R. OGDEN
State Bar No. 24073531
1010 Lamar, Suite 1600
Houston, Texas 77002
713.221.8300 Telephone
713.221.8301 Fax

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this 31st day of August, 2018 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

Via E-Service: fly63rc@verizon.net

Mark C. Enoch
Glast, Phillips & Murray, P.C.
14801 Quorum Drive, Ste. 500
Dallas, Texas 75254



MARK D. BANKSTON

DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession, including communications in the custody of any employee or agent of InfoWars LLC.
2. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession, including documents in the custody of any employee or agent of InfoWars LLC.
3. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. “Organizational chart” means a diagram that shows the structure of an organization and the relationships and relative ranks of its parts and positions/jobs.
5. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS
TO DEFENDANT INFOWARS, LLC**

REQUEST FOR ADMISSION NO. 1: Admit that InfoWars, LLC was involved in the creation, research, editing, marketing, funding, staffing, distribution, or publication of the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece."

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that InfoWars, LLC possesses intellectual property rights and copyright over any part of the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece."

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that InfoWars, LLC has the authority to remove content from InfoWars.com if InfoWars, LLC determines that the content violates the rights of others or is not appropriate for the website.

RESPONSE:

**PLAINTIFF'S FIRST SET OF INTERROGATORIES
TO DEFENDANT INFOWARS, LLC**

INTERROGATORY NO. 1: Identify all persons answering or supplying information used in answering these discovery requests and identify their job duties at InfoWars, LLC.

ANSWER:

INTERROGATORY NO. 2: Describe the business purpose of InfoWars, LLC.

ANSWER:

INTERROGATORY NO. 3: Describe all the ways in which InfoWars, LLC generates revenue.

ANSWER:

INTERROGATORY NO. 4: Identify every employee or agent of InfoWars, LLC who was involved in the creation, research, editing, marketing, funding, staffing, distribution, or publication of the June 26, 2017 video entitled "Zero Hedge Discovers Anomaly in Alex Jones Hit Piece," and describe their specific role.

ANSWER:

INTERROGATORY NO. 5: Does InfoWars, LLC share office space with any other named party?

ANSWER:

INTERROGATORY NO. 6: Does InfoWars, LLC share common employees with any other named party?

ANSWER:

INTERROGATORY NO. 7: Has an employee or agent of InfoWars, LLC ever rendered services on behalf on any named other party, or has an employee or agent of any named party ever rendered services on behalf on InfoWars, LLC? Describe.

ANSWER:

INTERROGATORY NO. 8: Has InfoWars, LLC ever made an undocumented transfer of funds to any named party, or has any named party ever made an undocumented transfer of funds to InfoWars, LLC? Describe.

ANSWER:

INTERROGATORY NO. 9: For each person who had ownership interest in InfoWars, LLC on June 26, 2017, state:

- a) their full name.
- b) the date(s) upon which the person acquired their ownership interest.
- c) the kind of consideration paid or promised for the ownership interest and the date(s) on which it was paid or promised.
- d) the nature of percentage of that individual's ownership interest.
- e) whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer, or director of InfoWars, LLC, and, if so, the identity of the other person and the nature of the relationship.

ANSWER:

INTERROGATORY NO. 10: Identify each person who has served as an officer, director, management-level employee of InfoWars, LLC at any time during the past five years.
or

ANSWER:

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION
TO DEFENDANT INFOWARS, LLC**

REQUEST FOR PRODUCTION NO. 1: An organizational chart for InfoWars, LLC as of June 26, 2017.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: All contracts in effect between InfoWars, LLC and any other party.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: All documents in the possession of InfoWars, LLC regarding the ownership, management, or administration of the InfoWars.com website.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: All incorporating documents for InfoWars, LLC, including article of incorporation, bylaws, certificate of incorporation, and notice of incorporation.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All documents or communications reflecting the ownership of The Alex Jones Show, InfoWars.com, the InfoWars brand, and its related intellectual property from 2017 to the present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All contracts in effect between Free Speech Systems, LLC and InfoWars, LLC.

RESPONSE:

CAUSE NO. 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

261st DISTRICT COURT

VERIFICATION

STATE OF TEXAS

§
§
§

COUNTY OF _____

BEFORE ME, the undersigned notary public, on this day personally appeared _____, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME, this the _____ day of _____, 2018.

Notary Public in and for the State of Texas

My Commission Expires:
