NO. X06-UWY-CV-18-6046436 S : SUPERIOR COURT

ERICA LAFFERTY, ET AL: COMPLEX LITIGATION DOCKET

V.: AT WATERBURY ALEX EMRIC JONES, ET AL: MARCH 21, 2022

NO. X06-UWY-CV-18-6046437 S : SUPERIOR COURT

WILLIAM SHERLACH: COMPLEX LITIGATION DOCKET

V.: AT WATERBURY ALEX EMRIC JONES, ET AL: MARCH 21, 2022

NO. X06-UWY-CV-18-6046438 S : SUPERIOR COURT

WILLIAM SHERLACH, ET AL: COMPLEX LITIGATION DOCKET

V.: AT WATERBURY

ALEX EMRIC JONES, ET AL: MARCH 21, 2022

MOTION FOR PROTECTIVE ORDER RE: DEPOSITION OF ALEX JONES

The Plaintiffs in the instant case have noticed the deposition of Alex Jones and are prepared to go forward on Wednesday and Thursday of this week in Austin, Texas. Indeed, at least one counsel for the plaintiffs is already in Austin; the undersigned intends to fly to Austin tomorrow. A second deposition of Robert Dew is scheduled in Austin for Friday.

At approximately 3:30 p.m. this afternoon, the undersigned received a telephone call alerting him that Mr. Jones was under the care of a physician for medical conditions that require immediate, and possibly, emergency testing. I spoke with a person representing himself to be a physician: he told me he was a licensed physician, had the qualifications to render an opinion about Mr. Jones' health, and that his opinion was that Mr. Jones should not sit for depositions this week. I asked for a second letter from the physician.

My client has not asked me to disclose the nature of the medical conditions or the identity of the physician. It is my hope that upon receipt of the physician's letter, I can share it with the Court on an *ex parte* basis.

WHEREFORE, defendants respectfully move this court for an order to postpone the

deposition of Alex Jones for a reasonable period of time consistent with his medical condition.

Respectfully Submitted,

Alex Emrich Jones; Infowars, LLC; Free Speech Systems, LLC; Infowars Health, LLC; and Prison Planet TV, LLC

BY:/s/ Norman A. Pattis/s/
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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/ Norman A. Pattis/s/ Norman A. Pattis