

NO. D-1-GN-18-001842

LEONARD POZNER AND
VERONIQUE DE LA ROSA
Plaintiffs,

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IN THE DISTRICT COURT OF

V.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,
AND FREE SPEECH SYSTEMS, LLC
Defendants

345th JUDICIAL DISTRICT

**DEFENDANTS’ REPLY TO PLAINTIFFS’ RESPONSE TO
OBJECTIONS TO LATE FILED DECLARATIONS OF
LEONARD POZNER AND VERONIQUE DE LA ROSA**

COME NOW, Defendants Alex E. Jones, Infowars, LLC and Free Speech Systems, LLC, (collectively, the “Defendants”), and hereby file this Reply to Plaintiffs’ Response to Defendants’ Objections to the late filed declarations of Leonard Pozner and Veronique De La Rosa and in opposition thereto would respectfully show this Honorable Court as follows:

**NO REQUEST FOR PLAINTIFFS’
ADDRESSES OR PERSONAL INFORMATION**

In response to Defendants’ Objections to the late filed declarations of Leonard Pozner and Veronique De La Rosa filed with this Court on August 6, Plaintiffs’ counsel responded by implying that the Defendants and undersigned seek personal information of the Plaintiffs including addresses and date of birth information. This was and is not the intent of the objections that were filed. Defendants and their counsel understand Plaintiffs’ desire to not share such information publicly and do not seek it. Instead, Defendants simply included in their many objections to these late filed declarations,

Plaintiffs' counsels' choice of evidence submission (using declarations instead of affidavits) for not following the statutory declaration form.

Accordingly, Defendants' asserted only objections to proposed evidence under the applicable laws and did not and do not seek any personal information from or about Plaintiffs. Defendants agree that Plaintiffs' personal information can be redacted from or omitted from any public filing.

WHEREFORE PREMISES CONSIDERED, Defendants respectfully request that the late filed declarations of Leonard Pozner and Veronique De La Rosa be stricken and/or that Defendants' objections be sustained and that the Court grant the Defendants' Motion to Dismiss and grant other relief as may be required under the Act together with such other relief as the Court deems equitable, just and proper.

RESPECTFULLY SUBMITTED,

GLAST, PHILLIPS & MURRAY, P.C.

/s/ Mark C. Enoch

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