

NO. D-1-GN-18-001835

NEIL HESLIN,

Plaintiff,

v.

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

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261st JUDICIAL DISTRICT

**SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF DEFENDANTS’ FIRST AMENDED
RESPONSE TO PLAINTIFF’S MOTION FOR SANCTIONS AND MOTION FOR
EXPEDITED DISCOVERY AND DEFENDANTS’ MOTION FOR SANCTIONS**

COME NOW, Defendants Alex E. Jones, Infowars, LLC, Free Speech Systems, LLC, and Owen Shroyer (collectively, the “Defendants”), and hereby file a supplemental affidavit in support of their First Amended Response to Plaintiff’s Motion for Sanctions and Motion for Expedited Discovery and Defendants’ Motion for Sanctions.

Defendants hereby file the Affidavit of Rob Dew attached hereto as Exhibit “A.”

RESPECTFULLY SUBMITTED,

GLAST, PHILLIPS & MURRAY, P.C.

/s/ Mark C. Enoch

Mark C. Enoch
State Bar No. 06630360
14801 Quorum Drive, Suite 500
Dallas, Texas 75254-1449
Telephone: 972-419-8366
Facsimile: 972-419-8329
fly63rc@verizon.net

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2018, the foregoing was sent via efiletxcourts.gov's e-service system to the following:

Mark Bankston
Kaster Lynch Farrar & Ball
1010 Lamar, Suite 1600
Houston, TX 77002
713-221-8300
mark@fbtrial.com

/s/ Mark C. Enoch
Mark C. Enoch

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TRAVIS COUNTY, TEXAS

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OWEN SHROYER,

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Defendants

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261st JUDICIAL DISTRICT

AFFIDAVIT OF ROB DEW

STATE OF TEXAS §

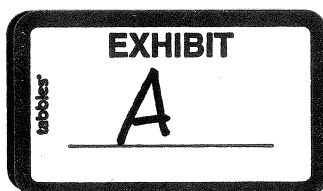
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COUNTY OF TRAVIS §


BEFORE ME, the undersigned notary public, on this day personally appeared Rob Dew, known to me to be the person whose name is subscribed below, and who on his oath, deposed and stated as follows:

1. My name is Rob Dew. I am over the age of 21 years, have never been convicted of a felony or crime involving moral turpitude, am of sound mind, and am fully competent to make this affidavit. I am directly in charge and oversee all news media and social media for Defendants. I have personal knowledge of the facts herein stated and they are true and correct.

2. Defendants did not delete or remove any video on Periscope that related in any way to Plaintiff, Mr. Pozner, Ms. De La Rosa, any parent or victim, Sandy Hook, Newtown, any investigation thereof or reports thereon, or any other person connected to that tragedy.

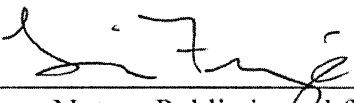


Further Affiant Sayeth Not.



Rob Dew

SWORN TO and SUBSCRIBED before me by Rob Dew on August 28, 2018.



Notary Public in and for
the State of Texas

My Commission Expires:

4-21-2022

