

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 30, 2022
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NO. X06-UWY-CV-18-6046437 S :	SUPERIOR COURT
WILLIAM SHERLACH :	COMPLEX LITIGATION DOCKET
V. :	AT WATERBURY
ALEX EMRIC JONES, ET AL :	MARCH 30, 2022
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**JONES DEFENDANTS’ MOTION FOR RECONSIDERATION OF COURT’S DECISION
TO START ESCALATING FINES FOR ALEX JONES ON APRIL 1, 2022**

On March 30, 2022, the Court held Alex Jones in contempt of court and imposed a \$25,000 per-weekday fine that increases by \$25,000 per-weekday until he sits for two days of depositions. The fine is stayed on the days that Mr. Jones appears for his deposition.

The Jones Defendants hereby respectfully move the Court to reconsider the start for Mr. Jones’ fine until April 10, 2022 on the grounds that no deposition has been rescheduled for Mr. Jones and other depositions in his case are scheduled for four days on the week of April 4, 2022. These dates include depositions that will take place out of state where Mr. Jones has been ordered to appear. Under the Court’s order, Mr. Jones would be required to post \$525,000 in fines by April 11, 2022 – a sum that crosses the border between a coercive sanction and a punitive one even though he would be able to move for reimbursement of those fines. In other words, the Court has functionally ordered Mr. Jones to post a \$525,000 bond at a bare minimum.

Additionally, while the Court did ask one of the undersigned to provide information about Mr. Jones' availability, it did not ask about the Plaintiffs' counsel's availability, and they did not volunteer any information as to their availability. They gave no indication to the Court that they are available on the week of April 4, 2022 – particularly when they have already reserved four days of depositions for witnesses other than Mr. Jones on the week of April 4, 2022. The persons to be deposed are named in the Plaintiffs' March 29, 2022 motion for an extension of discovery deadlines and are Owen Shroyer, Christopher Daniels, Joshua Owens, and Brittany Paz. Under the current agreement of counsel, those depositions are expected to occur April 5, 2022 through April 8, 2022, which would render the Plaintiffs' counsel unavailable to take Mr. Jones' deposition during those days if he so chose.

These reservations deprive Mr. Jones of the sole ability to purge his contempt – particularly when the Plaintiffs' counsel have given no indication of any willingness to reschedule these depositions to take Mr. Jones' deposition sooner rather than later. In other words, Plaintiffs' counsel control Mr. Jones' opportunity to purge himself, and, if they choose, they can force Mr. Jones to produce, on a daily basis, liquid financial assets in excess of \$100,000 per day if they so choose – a difficult task for anyone.

A key aspect of civil contempt is affording the contemnor a meaningful opportunity to purge the contempt by compliance with the Court's order. See *Ullmann v. State*, 230 Conn. 698, 710 (1994). Here, the punitive aspect of the Court's order is that it creates a separate contempt trap for Mr. Jones if he indicates his availability for a deposition and Plaintiffs' counsel choose to make him wait. Mr. Jones will still incur his obligation to produce payment to the Court's clerk in the excess of \$100,000. The act of production itself

will become punitive and could subject Mr. Jones to further contempt proceedings if he has difficulty in assembling such liquid assets.

Thus, the Jones Defendants ask the Court to stay the start of Mr. Jones' fine until April 11, 2022 – the date when both Plaintiffs' counsel and he have clear availability. This will afford him a meaningful opportunity to purge his contempt. The Court can compensate for this delay and still enforce its April 15, 2022 deadline for Mr. Jones' deposition by increasing the total amount of Mr. Jones' daily fine when it starts on April 11, 2022. This would enable the Court to still achieve the coercive objectives of civil contempt while not confining Mr. Jones to a situation where he is unable to purge himself of his contempt because of the unavailability of Plaintiffs' counsel.

Dated: March 28, 2022

Respectfully Submitted,

Alex 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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