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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

UNITED FEDERATION OF CHURCHES,
LLC (dba "THE SATANIC TEMPLE")

Plaintiff/Counterclaim
Defendant,

v.

DAVID ALAN JOHNSON (AKA "ADJ"),
LEAH FISHBAUGH, MICKEY MEEHAN,
and NATHAN SULLIVAN,

Defendants/
Counterclaimants

No. 23-2-06120-9 SEA

**DECLARATION OF DAVID
JOHNSON IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, David Johnson, declare as follows:

1. I am one of the defendants in the above captioned lawsuit. I make this declaration based on my own personal knowledge. I am over the age of eighteen and am otherwise competent to testify. If called upon to testify on the matters herein, I would do so consistently with this Declaration.

2. In May of 2019 I joined an autonomous local chapter of The Satanic Temple ("TST"), which at the time called itself The Satanic Temple-Seattle. The chapter later

1 changed its name to The Satanic Temple-Washington in January of 2020. For purposes of
2 this Declaration, I refer to the chapter as the “Washington Chapter.”

3 **The Memes Page**

4 3. Beginning in August of 2019, I volunteered with the Washington Chapter’s
5 “Media” team, which was responsible for disseminating information, particularly on social
6 media. In September of 2019, I also volunteered to serve on the Washington Chapter’s
7 “Strategy Council,” which consisted of approximately twenty guild heads (essentially,
8 volunteer committee-leads) plus the leaders of the Washington Chapter, who were called the
9 Washington Chapter’s Chapter Head and Media Liaison.

10 4. Through my roles with the Washington Chapter, I learned that the authority
11 for the Washington Chapter rested in the Washington Chapter’s Chapter Head and its Media
12 Liaison. The Washington Chapter’s Chapter Head at the time was Leah Garvais, also known
13 as “Siri Sanguine,” and the Media Liaison was Paul Case, also known as “Tarkus Claypool.”

14 5. Members of the Washington Chapter observed the authority of the Chapter
15 Head and Media Liaison being exercised on November 11, 2019, when Paul Case/Tarkus
16 Claypool and Leah Garvais/Siri Sanguine unilaterally removed a Chapter member who had
17 been leading the “South Sound Satanists” group in Tacoma, Olympia, and unincorporated
18 areas in the south Puget Sound region of Washington.

19 6. Before the member was removed in November of 2019, the South Sound
20 Satanists group (an unofficial group that did not have official chapter status) used a Facebook
21 page that was originally called “South Sound Satanists: Friends of TST.” The same day as
22 the removal of the South Sound Satanists member from the Washington Chapter, Paul
23 Case/Tarkus Claypool removed the other prior administrators of that Facebook page,
24 replacing them with Leah Garvais/Siri Sanguine.

25 7. Subsequently, internal discussions at the Washington Chapter occurred about
26 what might be done with the former member’s South Sound Satanists’ Facebook page, which

1 had largely been abandoned and silent. For the period of July 2019 through November 2019,
2 there were only three public posts on the page. After the member’s removal, from November
3 11 through December 24, 2019, there were no posts at all.

4 8. On December 21, 2019, Garvais/Siri Sanguine added me and co-defendants
5 Leah Fishbaugh and Mickey Powell as editors of the South Sound Satanists page. UFC lists
6 Mickey Powell in the caption of this case as Mickey Meehan, but Mickey’s legal last name
7 is Powell, so that is the name I will use in this declaration. During the events in this case,
8 Mickey Powell used the pseudonym Lenore Calavera. The plan was to turn the largely
9 abandoned page into a “memes page,” focusing on short-form humor and provocative images,
10 rather than use the page as a community. The page was intended to include funny “memes”
11 from places like Twitter and Tumblr. It was supposed to be tonally comedic, light, and ironic.

12 9. On January 1, 2020, Garvais/Siri Sanguine changed my role on the South
13 Sound Satanists page (now referred to as the “Memes Page”¹) to “admin” along with my co-
14 defendant Powell/Lenore Calavera. Pursuant to Facebook’s policies, having an “admin”
15 status provides the admin with the ability to fully control the page and its content, including
16 the ability to fully control all other users’ role assignments for the page.

17 10. Around that same time, Garvais/Siri Sanguine made a mistake and
18 accidentally renamed the South Sound page to “TST WA Allies.” This change was supposed
19 to take place on a related Facebook *group* for the South Sound Satanists, which had
20 previously facilitated semi-private communications among members in that region. The
21 *group* name was changed to welcome people statewide who were interested in supporting
22 TST’s work, but did not want to be members. Facebook *pages* are different from Facebook
23 *groups*. A Facebook *page* is more public and can be accessed by anyone in the public. A
24 Facebook *group* is used more for building communities among those with a Facebook profile
25

26 ¹ In its motion and pleadings, plaintiff United Federation of Churches refers to the Memes
Page as the “Allies page.”

1 who share a common interest, such as employees or church members. Unlike pages, groups
2 can be private or semi-private.²

3 11. The Facebook *group* that had been associated with the South Sound Satanists
4 for their own organizing and socializing was scrubbed of identifying information (such as
5 addresses for meeting up to work on crafts) and was opened to non-chapter members
6 statewide. This Facebook group was re-named “The Satanic Temple - Washington State
7 (Allies)” on January 1, 2020. On the same date, Garvais/Siri Sanguine mistakenly renamed
8 the South Sound Satanists *page* to “TST WA Allies.” Because Facebook does not allow a
9 name to be changed again too soon after a prior change, the page name could not immediately
10 be fixed. However, at this same time, the page’s username/url was changed to be
11 “facebook.com/queersatanicmemes³” and the future intent was to change the name of the
12 page to something relating to the url, aligning the page with its new “meme” content.

13 **The Washington Chapter Gave Me and Mickey Powell The Memes Page**

14 12. On March 12, 2020, Garvais/Siri Sanguine sent an email regarding a dispute
15 relating to a former member who was upset about the chapter continuing to use their image
16 for promoting the chapter and other public actions by the chapter, even after that member had
17 been driven out years before following months of unaddressed sexual harassment from
18 another Washington Chapter member. Garvais/Siri Sanguine announced that the resolution
19 of the dispute involved unilaterally dissolving the Washington Chapter’s guilds and naming
20 a new strategy council of herself, Paul Case/Tarkus Claypool, and about a half dozen other
21 hand-picked people.

22 13. In an email on March 14, 2020, Garvais/Siri Sanguine berated Mickey
23 Powell/Lenore Calavera for his social media work (that he had been providing on a voluntary

24 _____
25 ² These differences are explained by Facebook in a short Facebook Help Center post called
26 “Differences between Profiles, Pages and Groups on Facebook,” available at
<https://www.facebook.com/help/337881706729661>.

³ The username/url for this page has since been changed to “facebook.com/QueerSatanic.”

1 and complimentary basis) and was critical of the content he was posting on the Memes Page.
2 The same day, Powell/Lenore Calavera removed Garvais/Siri Sanguine and Case/Tarkus
3 Claypool as admins from the Memes Page. Afterward, I changed the name of the Memes
4 Page to “Evergreen Memes for Queer Satanic Fiends” to align with the intended “memes”
5 purpose of the page.

6 14. In another email to all local members the same evening, Garvais/Siri Sanguine
7 publicly accused Powell/Lenore Calavera of having “stolen” the former South Sound
8 Facebook page (at the time mistakenly named “TST WA Allies”) and said Powell/Lenore
9 Calavera was banned nationally for the “theft.” A true and correct copy of that email is
10 attached hereto as **Exhibit 1**.

11 15. However, after Garvais/Siri Sanguine sent her email at 7:48 pm, the
12 Washington Chapter leadership changed their position. At 9:09 pm, after I had changed the
13 name on the page, and after Powell/Lenore Calavera posted a statement that the page was no
14 longer affiliated with TST, the Washington Chapter’s Media Liaison, Case/Tarkus Claypool,
15 sent Powell/Lenore Calavera an email with the subject line “Evergreen Memes for Queer
16 Satanic Fiends.” In the email, Case/Tarkus Claypool told Powell/Lenore Calavera that the
17 Washington Chapter had no interest in the page and stated that Powell/Lenore Calavera and
18 I could have and use the page “free and clear.” See **Exhibit 2**, which is a true and correct
19 copy of the March 14, 2020 email Case/Tarkus Claypool sent to Powell/Lenore Calavera,
20 and which Powell/Lenore Calavera provided to me.

21 16. The next day, in a March 15, 2020 online (Zoom) town hall meeting, Media
22 Liaison, Paul Case/Tarkus Claypool, again publicly reiterated in front of the Washington
23 Chapter’s members and the Washington Chapter’s Chapter Head (Garvais/Siri Sanguine) that
24 the Washington Chapter had no interest in the Memes Page and that he wished us (the current
25 defendants) all well in using the page. An electronic copy of a video of that town hall meeting
26 is submitted hereto as **Exhibit 3**, which has been provided to the Court in hard copy via a

1 physical thumb drive of the recording. Paul Case/Tarkus Claypool’s statement is at
2 approximate timestamp 1:20:35 on the video. In the video, Claypool states:

3 I do want to say that **we’re not going to, you know, ask Lenore to**
4 **give the page back in any way. I wish them well, and I hope that**
5 **they continue growing that and make it a great success.** Because
6 they’re going to fight their fight, their way. And so, let them do what
7 they want to, and I wish them well, because both Lenore and ADJ
8 [“ADJ” means me, David Johnson] did a wonderful job in the roles
9 that they had. It just wasn’t within the TST guidelines that we are
10 beholden to. So I want to give them due credit, and just you know,
11 **wish them well with what they’re going to plan to do with it in**
12 **the future.**

13 17. Garvais/Siri Sanguine spoke immediately after Case at 1:21:10 of the same
14 video, implicitly agreeing with him and expressing her personal enjoyment of the
15 Defendants’ posts on the Memes Page. **Exhibit 3** at 1:21:10-1:21:28.

16 18. Since making these clear, public statements that the Washington Chapter had
17 no interest in the Memes Page and that we were free to use the Memes Page, no one from the
18 Washington Chapter has ever retracted these statements or asked us to give up control of the
19 Memes Page.

20 19. Before the United Federation of Churches, LLC (“UFC”) filed its original
21 complaint against us in federal court in April of 2020, no one from or representing UFC
22 asserted any ownership of or rights to the Memes Page or asked for access to it.

23 20. I and my fellow defendants in this matter relied on these clear statements by
24 the Washington Chapter’s Media Liaison and Chapter Head that we were free and clear to
25 use the Memes Page for our own purposes and that the Washington Chapter had no interest
26 in the Page and have accordingly used the Memes Page for our own purposes.

The Chapter Page

21 21. To my recollection, in January of 2020, the Washington Chapter gave me
22 “admin” status for the Washington Chapter Facebook Page.

1 22. In early January of 2020, when the Washington Chapter changed its name, it
2 also changed the name of a Facebook Page the Chapter had been using from “The Satanic
3 Temple – Seattle Chapter” to “The Seattle Temple-Washington State Chapter.”

4 23. Around this same time, the Washington Chapter also became a limited liability
5 company (LLC) called “Infernal Washington, LLC.” The governor for the LLC was Leah
6 Garvais/Siri Sanguine. The Chapterhead and Media Liaison for the Washington Chapter
7 remained the same despite these changes, with Leah Garvais/Siri Sanguine continuing to
8 serve as the Chapter Head and Paul Case/Tarkus Claypool continuing to serve as the
9 Chapter’s Media Liaison.

10 24. On March 22, 2020, as an “admin” on the Washington Chapter Facebook
11 Page, I removed other admins and editors, and changed its status to “permanently closed” so
12 that it essentially became a dormant, archived page. To reflect this, I changed the name to
13 “Satanic Washington State – Archived Temple Chapter.”

14 25. On or around May 27, 2020, I was notified by Facebook that I was removed
15 as an administrator for the page. Since approximately May 27, 2020, I have not had or
16 attempted to have administrative access to the Washington Chapter Facebook Page.

17 **Plaintiff’s Counsel’s Harassing Statements**

18 26. At times over the last several years, the Memes Page has included information
19 about various legal filings and doings of The Satanic Temple, such as when their cases in
20 other jurisdictions are dismissed, when their legal counsel is sanctioned, or when they
21 threaten other critics of The Satanic Temple with lawsuits.

22 27. Perhaps because of these postings, UFC, through its lead counsel, Matt
23 Kezhaya, has publicly expressed personal animus toward me and my fellow defendants in
24 this case. For example, on May 26, 2022, Kezhaya used an account on Reddit called
25 “u/stormsmcgee” to post the following about us, referring to us by the name we use on the
26 Memes Page (“Queer Satanic”):

1 *I will not answer any questions related to the idiots that call themselves*
2 *“QueerSatanic,” or their idiot-conspiracy theories. My only comment on*
3 *that topic is:*

4 *I can’t believe you morons have spent more than \$80,000 fighting to keep*
5 *TST’s Facebook page. You are pathetic. You have no concept of civil*
6 *liberties, or what is at stake by the ever-encroaching theocracy. Your*
7 *lawyer is a gentleman and a scholar. I hope he squeezes every last penny*
8 *from you living corpses, and anyone that gives you the time of day.*

9 Kezhaya or someone else appears since to have edited this post to remove this insulting attack
10 on me and my co-defendants. However, I located the post in a collection of websites archived
11 by a non-profit organization called the Internet Archive, using the search feature at
12 www.archive.org, known as the “Wayback Machine.” Attached hereto as **Exhibit 4** is a true
13 and correct copy of a portion of the webpage [https://web.archive.org/web/20220527005507](https://web.archive.org/web/20220527005507/https://www.reddit.com/r/SatanicTemple_Reddit/comments/uym4sv/tst_court_update_may_26_2022_this_one_is_by_tsts/)
14 [https://www.reddit.com/r/SatanicTemple_Reddit/comments/uym4sv/tst_court_update_may](https://www.reddit.com/r/SatanicTemple_Reddit/comments/uym4sv/tst_court_update_may_26_2022_this_one_is_by_tsts/)
15 [26_2022_this_one_is_by_tsts/](https://www.reddit.com/r/SatanicTemple_Reddit/comments/uym4sv/tst_court_update_may_26_2022_this_one_is_by_tsts/) as that site appeared on the Wayback Machine on December
16 11, 2022 (emphasis added). This exhibit has been highlighted for the Court’s convenience.
17 The individuals who Kezhaya referred to as “the idiots that call themselves ‘QueerSatanic,’”
18 “morons,” and “living corpses” are me and my co-defendants in this case.

19 28. On November 16, 2022, in his public Twitter account, Kezhaya wrote:

20 *Are these fuckwits still talking about me? Grow up, and file an answer so I*
21 *can get at your financial records. I’m coming for you. Tell the judge on me*
22 *again, I double dare you.*

23 Attached as **Exhibit 5** is a true and correct copy Kezhaya’s November 16, 2022 tweet. The
24 people he calls “fuckwits” in this tweet are me any my codefendants in this case.

25 I declare under penalty of perjury under the laws of the State of Washington that the
26 foregoing is true and correct.

Executed in Seattle, Washington on this 22 day of August 2024.

David Johnson
David Johnson (Aug 22, 2024 16:13 PDT)

David Johnson

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I caused true and correct copies of the foregoing
3 document to be served upon the following, at the addresses stated below, via the method of
4 service indicated.

5 **LYBECK PEDREIRA & JUSTUS, PLLC**

6 Benjamin Justus
7 Fifth Floor
8 7900 SE 28th St., Suite 500
9 Mercer Island, WA 98040
ben@lpjustus.com

E-mail
 U.S. Mail
 E-filing

10 **KEZHAYA LAW PLC**

11 Matthew A. Kezhaya (*pro hac vice*)
12 150 S. Fifth Street, Suite 1850
13 Minneapolis, MN 55402
matt@kezhaya.law

E-mail
 U.S. Mail
 E-filing

14 *Attorneys for Plaintiff*

15 Dated this 23rd day of August, 2024 in Seattle, Washington.

16 */s/ Janet C. Fischer*
17 Janet C. Fischer
18 Paralegal

EXHIBIT 1

[tst-washington] TST WA Allies group on Facebook Inbox



Sat, Mar 14, 2020,
7:48 PM

Siri Sanguine

<sirisanguine@gmail.com>

[Unsubscribe](#)

to tst-washington

Good evening,

It has be brought to our attention that Lenore Calavera has stolen our FB page TST WA Allies and renamed it "evergreen memes for queer satanic fiends". I have informed our contacts at IC and are awaiting advice on next steps.

Due to this rogue behavior Lenore is not longer to be considered a member of TST WA and will be placed on the National list of banned members for their theft.

Thank you,

Siri

TST000151

EXHIBIT 2



Evergreen Memes for Queer Satanic Fiends

1 message

Tarkus Claypool <tarkus.claypool@gmail.com>
To: Lenore Calavera <lenorecalavera@gmail.com>

Sat, Mar 14, 2020 at 9:09 PM

Hi Lenore,

I saw that you made some changes to the TST WA State Allies FB group. I just wanted to let you know that it's yours free and clear and we've no desire to claim it. You and ADJ built it and have done a great job doing so. I'm confident you'll both continue doing awesome work.

Sorry the way things panned out, and I do mean all of it. I wish you and your family well, and respect your need to fight the fight your way.

Rock on,

-Tarkus Claypool
Media Liaison, The Satanic Temple of Washington
(he/him)

--

CONFIDENTIALITY NOTICE

The content of this email is confidential and intended only for those parties who received the email directly from the tarkus.claypool@gmail.com address. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.

EXHIBIT 3

Video Filed in Hard Copy

EXHIBIT 4

r/SatanicTemple_Reddit - TST Court Update! (May 26, 2022) -- this one is by TST's lawyer

Hello everyone! Thank you for your interest in TST's legal efforts. I'm Matt Kezhaya, TST's general counsel. I am recently the subject of a Federal Judge's ire, which is actually pretty normal in my law practice (TST cases and otherwise).

So I've been made aware that Mr. "Chip on my shoulder after Matt bailed out on a podcast taping because I misled him into believing I'm a TST supporter" Hail Satan Podcast guy is crowing about a sanctions order against me. I felt the community was entitled to know the other side of the story.

I'll start with the bottom line-upfront. Yes, I am ordered to pay about \$17,000 of my own personal money because I have been a very naughty boy, or so the Judge says. I have a different take, of course. Basically this sanctions order is the product of a bait-and-switch scheme. TST was told that some of its claims were legally insufficient, and were to be dismissed from an ongoing lawsuit ("TST 1"). But, TST was assured that it was entitled to fix the claims and refile them. I asked the Court if I could fix the claims in the ongoing lawsuit ("TST 1") and a magistrate said "no." A magistrate is not allowed to preclude other lawsuits, and TST was told it could refile the dismissed claims, so I refiled the dismissed claims as "TST 2." The District Judge later affirmed the magistrate's then-six-month-old decision to tell me "no" and, since I already filed TST 2, TST 2 was to be dismissed without leave to refile and I owe the City's lawyers \$17,000 for them having to get TST 2 dismissed. Again, bait-and-switch: "you can refile" turned into "how dare you refile."

That's the short version. If you're interested in the case, read on. If not, I'll be around to answer questions about TST's legal efforts. No promises on answering every question. If I think your question is harmful to the organization I'll probably ignore it, unless I feel like fucking with you. I'm TST's cheerleader, so please note that I am maximum biased in TST's favor. I will not answer any questions related to the idiots that call themselves "QueerSatanic," or their idiot-conspiracy theories. My only comment on that topic is:

I can't believe you morons have spent more than \$80,000 fighting to keep TST's Facebook page. You are pathetic. You have no concept of civil liberties, or what is at stake by the ever-encroaching theocracy. Your lawyer is gentleman and a scholar. I hope he squeezes every last penny from you living corpses, and anyone that gives you the time of day.

Not very "First Tenet," or whatever, but you can't teach an old war dog new tricks.

On with Belle Plaine.

This case arose from TST's efforts to get equal treatment to a "limited public forum" (a place where a government opens its private property for the purpose of accommodating expressive activity about a particular topic), which the City of Belle

Plaine opened, "basically so the cross could stay in the Park" (that's a verbatim quote from the mayor, follow [this link](#) to see him say it for yourself, it's at 1:15 - 1:20). The full meeting can be found [here](#). The primary purpose of that meeting was to hear out the local Catholic priest's religious objection to the City granting TST equal access to the forum.

Rewind about four months, and the City Council had a meeting to hear out a proposal to open the Park to private monuments. The full meeting can be found [here](#). The proposal was prepared by the ADF (a Christian legal advocacy group) and presented by the Veterans Group, who were proponents of putting this Christian monument in the park.

At that meeting, Councilor Stier, who would later become the tie-breaking vote asks for assurances there would be no competitor monuments by an Atheist or Satanic group:

[I've seen monuments that are going up in Detroit right now that have [a] Satanic meaning to them. So, how can we up here, be assured that, number one, these monuments won't go into that Park?

The proponent of the proposal assured him that, indeed, the proposal is designed to allow in their good Christian monument to the contemplated exclusion of dirty Atheists or Satanists:

[There is [sic] specific criteria . . . [that] the monument would be consistently seen in other memorial parks. A Satanic statute is not consistently seen in other memorial parks. Your foxhole, for an atheist foxhole thing, is not consistently seen in other memorial parks.

The particularly astute among you might think "That's super illegal, they can't do that!" And you are correct. The City Attorney tells them as much:

[[T]his is illustrating my concern . . . The concern is that if the intent is, or the effect of the criteria is, to eliminate certain messages, that is constitutionally suspect—which is putting it nicely. That is exactly what is not allowed: [which] is for the government to establish rules which prevent certain religions from speaking.

You can hear the above exchange for yourself by following [this link](#).

Councilor Stier was also concerned about the [FFRF](#) having a monument, but the FFRF never did join in on the fun. They correctly figured that once we got involved, the Cross would go away.

The City attorney was very much against the proposal because, obviously, TST would be demanding equal access to this forum. We told them as much. Ultimately, the final policy was clear that everyone is allowed in, but your display would have to honor Belle Plaine veterans.

So, TST did what it is famous for and created a display that honors Belle Plaine veterans. It's [beautiful](#). The artist even donated \$40,000 worth of services, just because he supports the cause. But, once TST announced it was ready for some of that constitutionally-guaranteed equal access to the "free speech zone," the City delayed installation efforts until they closed the forum.

So, TST did what it is famous for and sued the government for a whole lot of constitutional violations. The problem is that this was before my involvement with TST, so the complaint not up to the task of overcoming judicial bias. Follow [this link](#) to see their complaint. Compare [mine](#). See, TST's original lawyers made the fatal error of thinking that TST actually receives its rightful "equal treatment under the law." No, I'm afraid that judges are willfully ignorant about basic concepts like "recuse if you feel like you are biased" once it comes time to dogpile onto an oppressed minority religion.

The Judge hand-waved some basic notions like "free speech" and "Satanists have just as much a right as Christians to participate in the public square," and [dismissed](#) all but one claim for various reasons. But we were told that we could refile (that's what "[Dismissed without prejudice](#)" means).

Rather than file a whole other lawsuit, I figured "hey let's just have one lawsuit, that's twice as efficient for everyone!" [Boy was I wrong](#). Basically, the magistrate chastised me because I waited two months to get started on discovery, on a case that had been running for 1.5 years. Fuck me for having other cases, I guess. And since I was "dilatory," I could take TST's dismissed claims and I could fuck all the way off.

So that put me in a bit of a pickle. TST needed a dismissal "with prejudice" or I can't appeal. But the Magistrate said I'm not allowed to bring those claims into TST 1. But I was told I could refile. And Magistrates lack the power to preclude claims. And, if I appealed the Magistrate's order, the District Judge was almost certain to affirm the Magistrate, which *might* preclude the claims (District Judges do have the power to preclude claims.)

So, I said "fuck the Magistrate, [and the police while you're at it](#)" and filed the claims (which I really can't overstate had been "[dismissed without prejudice](#)") as a separate lawsuit. I was entitled to file them all along, so if the Magistrate wants to be inefficient, that sounds like "not-me" problem. [Boy was I wrong](#).

I guess the moral of the story is, if a judge tells you that you are entitled to refile some dismissed claims as a separate lawsuit, the judiciary can take its "strong preference for judicial economy" and shove it all the way up their collective asses. Better to ask for forgiveness because, if you ask for permission first, you risk paying your chickenshit adversary [\\$17,000](#). God forbid the [insurance company](#) take a loss.

The underlying orders of dismissal are on appeal. If you want to hear me say all the above in a professional tone and with all the legal authority to back up why I'm right about everything and the District Judge is a big dum-dum, the briefing is worth a read.

- Here is my [opening brief](#).
- Here is the appendix (which has all the important record entries)
 - [TST 1](#) and
 - [TST 2](#); and
- Here is the [addendum](#) (which has all the orders at issue).
- Here is my [reply](#), which explains why the City's response to my opening brief is full of shit.

You'll want the appendices and addendum handy to cite-check my claims about what the record says.

I didn't share the filemarked copies because, for some ungodly reason, efilng removes bookmarks and I think bookmarks are incredibly helpful.

You can get their response from [PACER](#) (case no. **21-3079**), but it's not worth reading because it is the legal equivalent of "nuh uh," except they didn't even respond to most of my points. I would share my copy, but it has all of my super-secret notes and highlighting on it.

I will appeal the sanctions order. And I am asking for reassignment if I win either appeal.

AMA re: TST legal stuff.

EXHIBIT 5



Matt Kezhaya
@matt_kezhaya



Replying to [@satanicherald](#) and [@QueerSatanic](#)

Are these fuckwits still talking about me?
Grow up, and file an answer so I can get at
your financial records. I'm coming for you.
Tell the judge on me again, I double dare
you.

2:20 PM · Nov 16, 2022 · Twitter for Android