

NO. 141-307474-19**VICTOR MIGNOGNA**
Plaintiff,**V.****FUNIMATION PRODUCTIONS, LLC,**
JAMIE MARCHI, MONICA RIAL AND
RONALD TOYE,
Defendants.§
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§**IN THE DISTRICT COURT****141st JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS****DEFENDANT'S MOTION TO QUASH NOTICE TO TAKE THE ORAL AND**
VIDEOTAPED DEPOSITION OF RONALD TOYE WITH SUBPOENA DUCES TECUM
AND MOTION FOR PROTECTIVE ORDER**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Ronald Toye ("Defendant" herein), and requests the Court to quash a notice of deposition and to issue a protective order in connection therewith, and shows the following in support thereof:

1. On or about May 3, 2019, Defendant was served with a Notice of Deposition to Take the Oral and Videotaped Deposition of Ronald Toye with Subpoena Duces Tecum (attached herein and incorporated by reference as Exhibit "A" and referred to in this Motion as the "Notice of Deposition") in this matter to occur on May 14, 2019, beginning at 9:00 a.m. at the law offices of Plaintiff's attorneys located at 100 Independence Places, Suite 300, Tyler, Texas 75703.

2. Defendant requests that the Court quash the Notice of Deposition and issue a protective order for the reason set forth herein. This Motion is filed within three business days after service of the Notice of Deposition; therefore, the deposition is automatically stayed until this Motion can be determined per Texas Rules of Civil Procedure 199.4.

3. Defendant objects to the Notice of Deposition as follows:

a. The deposition was unilaterally noticed without confirmation of

Defendant's counsel, with less than a two-week notice, and without sufficient advance notice of the deposition.

b. Defendant objects to the date and time of the proposed deposition.

c. Defendant objects to the place of the taking of the proposed deposition.

4. Furthermore, pursuant to an email communication sent by Ty Beard to Defendant's attorney on May 5, 2019 at 11:04 a.m., Plaintiff has withdrawn the Subpoena Duces Tecum and his discovery requests included in his Notice of Deposition at this time.

5. A trial court has broad discretion to protect a party with a protective order. Defendant asks the Court to exercise its discretion and grant a protective order because it is necessary to protect Defendant from undue burden, unnecessary expense, harassment, annoyance, and/or invasion of personal, constitutional, or property rights.

6. Pursuant to Rule 191.2 of the Texas Rules of Civil Procedure, efforts to resolve these matters without court intervention were attempted, as evidenced by the Certificate of Conference included herein.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant requests that the Court quash the above-described Notice of Deposition, that a protective order be entered, and for such other and further relief that may be awarded at law or in equity.

Kessler Collins, P.C.

Casey Erick

Casey S. Erick

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Tel. (214) 379-0732

Fax. (214) 373-4714

Attorneys for Defendants

Monica Rial and Ronald Toye

CERTIFICATE OF CONFERENCE

I certify that on May 3, 2019, I contacted Plaintiff's counsel and requested he withdraw the Notices of Deposition served on Defendants. Plaintiff's counsel responded and stipulated that the Subpoena Duces Tecum and document requests therein were inadvertently included with the deposition notices but did not agree to withdraw the Notices of Deposition. As of the date of this motion, Plaintiff has not withdrawn the Notices of Deposition, and, therefore, this motion is presented to the Court for determination.

Casey Erick

Casey S. Erick

CERTIFICATE OF SERVICE

I certify that on May 7, 2019 a true and correct copy of Defendant's Motion to Quash Notice of Intent to Take the Oral and Videotaped Depositions of Ronald Toye with Subpoena Duces Tecum and Motion for Protective Order was served on Ty Beard electronically through the electronic filing manager.

Casey Erick

Casey S. Erick

OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS

In addition to Defendant's request for a protective order, and without waiving same, Defendant objects to the requests for documents as follows.

1. All documents and communications (including electronically stored information in its native format) referencing Plaintiff or Defendants from June 1, 2017 to the present. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

2. All documents and communications (including electronically stored information in its native format) referencing Plaintiff between (a) the more recent of (i) the date you first met Plaintiff or (ii) January 1, 2014 and (b) the present. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

3. All documents and communications (including electronically stored information in its native format) from any third party that relate to your allegations that Plaintiff has (a) assaulted/sexually assaulted people for (i) 20 plus years and/or (ii) 30 plus years and (b) is a predator. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information

sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

4. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed defamation. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

5. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed tortious interference with existing contracts. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

6. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed tortious interference with prospective contracts. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

7. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed and participated in a civil conspiracy against Plaintiff. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

8. All documents and communications (including electronically stored information in its native format) supporting your allegation that Plaintiff, Plaintiff's Mother, Plaintiff's lawyers and Plaintiff's girlfriend are involved in a civil conspiracy. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

9. All documents and communications (including electronically stored information in its native format) supporting your allegations that Plaintiff, Plaintiff's Mother, Plaintiff's lawyers and Plaintiff's girlfriend are involved in "interference." Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

10. All documents and communications (including electronically stored information in its native format) relating to any investigation conducted by Funimation Productions, LLC into allegations that Plaintiff assaulted, harassed, sexually assaulted or sexually harassed any person or otherwise conducted himself inappropriately toward any person. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

11. All documents and communications (including electronically stored information in its native format) between yourself and Funimation Productions, LLC, Sony Pictures Television, Inc, Roosterteeth and any other similar studios whether in the United States or Japan referencing Plaintiff. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

12. All documents and communications (including electronically stored information in its native format) relating to the “100s” and “1000s” of sexual assaults that you have alleged Plaintiff committed. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written,

implicates personal, constitutional, or property rights of Defendant that are privileged.

13. All documents and communications (including electronically stored information in its native format) that demonstrate Plaintiff has encouraged his fans to (a) harass you and (b) intimidate you. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

14. All documents and communications (including electronically stored information in its native format) that prove your allegations “of assaults that the public is not aware” allegedly committed by Plaintiff. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

15. All documents and communications (including electronically stored information in its native format) that prove your allegations that Plaintiff is “robbing” his fans. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

16. All documents and communications (including electronically stored information in its

native format) that prove that Plaintiff has assaulted/sexually assaulted (a) Monica Rial,

(b) 3 personal friends of yours, and (c) 10 personal friends of yours as you have alleged.

Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

17. All documents and communications (including electronically stored information in its native format) supporting any counter-claims you will assert. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

18. All documents and communications (including electronically stored information in its native format) supporting any affirmative defenses you will assert. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

19. All documents and communications (including electronically stored information in its native format) of the “discovery” you have claimed in multiple tweets you have been collecting

to use against Plaintiff in this lawsuit. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

20. All documents and communications (including electronically stored information in its native format) with the (a) local police/sheriff's department where your residence is located, (b) Department of Homeland Security and/or (c) the FBI since January 17, 2019. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

21. All documents and communications (including electronically stored information in its native format) with any local, state or federal government agency that involve or mention Plaintiff. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

22. All documents and communications (including electronically stored information in its native format) between yourself and Anime/Science Fiction/Dragonball convention organizers, employees, vendors and suppliers referencing Plaintiff. Defendant objects to said Request as

follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

23. All documents and communications (including electronically stored information in its native format) between yourself and Kamehacon 2019 organizers, employees, staffers, vendors or suppliers referencing Plaintiff. Defendant objects to said Request as follows:

The discovery request is overly broad or is not reasonably limited in scope or time. Furthermore, Defendant has not been given a sufficient amount of time for compliance with the request. The discovery request calls for information that is privileged, and that has been or will be properly asserted under Texas Rule of Procedure 193.3. The information sought by the discovery request is, at least in part, obtainable from some other source that is more convenient, less burdensome, or less expensive. The discovery request, as written, implicates personal, constitutional, or property rights of Defendant that are privileged.

CAUSE NO. 141-307474-19

VICTOR MIGNOGNA,	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
v.	§	
	§	141ST JUDICIAL DISTRICT
FUNIMATION PRODUCTIONS, LLC,	§	
JAMIE MARCHI, MONICA RIAL,	§	
AND RONALD TOYE,	§	
Defendants	§	TARRANT COUNTY, TEXAS

**PLAINTIFF'S NOTICE OF INTENT TO TAKE THE ORAL AND VIDEOTAPED
DEPOSITION OF RONALD TOYE WITH SUBPOENA DUCES TECUM**

TO: Defendant, RONALD TOYE, by and through his attorney of record Casey S. Erick, 2100 Ross Avenue, Suite 750, Dallas, Texas 75201.

Please take notice that at the time, date and place set forth below, Plaintiff will take the oral and video deposition of the witness named below pursuant to the Texas Rules of Civil Procedure 199.2:

NAME OF WITNESS: Ronald Toye

TIME AND PLACE: May 14, 2019, 9:00 a.m., BEARD • HARRIS • BULLOCK • HUGHES, 100 Independence Places, Suite 300, Tyler, Texas 75703

DEPOSITION OFFICER: Lexitas Court Reporting, Tyler, Texas 903-593-3213

ALTERNATIVE MEANS OF CONDUCTING AND/OR RECORDING:

Please take notice that the deposition will be recorded by stenographic recording and video and/or audio by Lexitas Court Reporting. This deposition will continue from day to day until completed.

REQUEST FOR PRODUCTION

Under Rule 199.2(b)(5), Ronald Toye is requested to produce at the taking of this deposition, the documents listed in Exhibit "A" attached hereto and incorporated herein for all purposes.

EXHIBIT A

Respectfully submitted,

BEARD • HARRIS • BULLOCK • HUGHES

By: /s/ Ty Beard

Ty Beard

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Email: Jim@beardandharris.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being served upon all counsel of record via electronic filing in accordance with the Rules of Civil Procedure on the 3rd day of May, 2017.

(Via Electronic Filing cerick@kesslercollins.com)

Kessler Collins, PC

2100 Ross Avenue, Suite 750

Dallas, Texas 757201

Attorney for Defendant Ronald Toyne

Lexitas Court Reporting (Via Email stacie.sartors@lexitaslegal.com)

Tyler, Texas

/s/ Ty Beard

Ty Beard

EXHIBIT “A”

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All documents and communications (including electronically stored information in its native format) referencing Plaintiff or Defendants from June 1, 2017 to the present.
2. All documents and communications (including electronically stored information in its native format) referencing Plaintiff between (a) the more recent of (i) the date you first met Plaintiff or (ii) January 1, 2014 and (b) the present.
3. All documents and communications (including electronically stored information in its native format) from any third party that relate to your allegations that Plaintiff has (a) assaulted/sexually assaulted people for (i) 20 plus years and/or (ii) 30 plus years and (b) is a predator.
4. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed defamation.
5. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed tortious interference with existing contracts.
6. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed tortious interference with prospective contracts.
7. All documents and communications (including electronically stored information in its native format) supporting your claim that you have not committed and participated in a civil conspiracy against Plaintiff.
8. All documents and communications (including electronically stored information in its native format) supporting your allegation that Plaintiff, Plaintiff’s Mother, Plaintiff’s lawyers and Plaintiff’s girlfriend are involved in a civil conspiracy.
9. All documents and communications (including electronically stored information in its native format) supporting your allegations that Plaintiff, Plaintiff’s Mother, Plaintiff’s lawyers and Plaintiff’s girlfriend are involved in “interference.”
10. All documents and communications (including electronically stored information in its native format) relating to any investigation conducted by Funimation Productions, LLC into allegations that Plaintiff assaulted, harassed, sexually assaulted or sexually harassed any person or otherwise conducted himself inappropriately toward any person.

11. All documents and communications (including electronically stored information in its native format) between yourself and Funimation Productions, LLC, Sony Pictures Television, Inc, Roosterteeth and any other similar studios whether in the United States or Japan referencing Plaintiff.
12. All documents and communications (including electronically stored information in its native format) relating to the “100s” and “1000s” of sexual assaults that you have alleged Plaintiff committed.
13. All documents and communications (including electronically stored information in its native format) that demonstrate Plaintiff has encouraged his fans to (a) harass you and (b) intimidate you.
14. All documents and communications (including electronically stored information in its native format) that prove your allegations “of assaults that the public is not aware” allegedly committed by Plaintiff.
15. All documents and communications (including electronically stored information in its native format) that prove your allegations that Plaintiff is “robbing” his fans.
16. All documents and communications (including electronically stored information in its native format) that prove that Plaintiff has assaulted/sexually assaulted (a) Monica Rial, (b) 3 personal friends of yours, and (c) 10 personal friends of yours as you have alleged.
17. All documents and communications (including electronically stored information in its native format) supporting any counter-claims you will assert.
18. All documents and communications (including electronically stored information in its native format) supporting any affirmative defenses you will assert.
19. All documents and communications (including electronically stored information in its native format) of the “discovery” you have claimed in multiple tweets you have been collecting to use against Plaintiff in this lawsuit.
20. All documents and communications (including electronically stored information in its native format) with the (a) local police/sheriff’s department where your residence is located, (b) Department of Homeland Security and/or (c) the FBI since January 17, 2019.
21. All documents and communications (including electronically stored information in its native format) with any local, state or federal government agency that involve or mention Plaintiff.

22. All documents and communications (including electronically stored information in its native format) between yourself and Anime/Science Fiction/Dragonball convention organizers, employees, vendors and suppliers referencing Plaintiff.
23. All documents and communications (including electronically stored information in its native format) between yourself and Kamehacon 2019 organizers, employees, staffers, vendors or suppliers referencing Plaintiff.