



From: Lane Haygood lhaygood@kusklaw.com
Subject: Re: Meet and Confer
Date: May 19, 2026 at 12:05 AM
To: Matthew Hardin hardinlawpllc@icloud.com
Cc: Marc Randazza mjr@randazza.com, Kathryn Tewson ktewson@kusklaw.com, matt@matthewhardin.com, Thom Prince tprince@kusklaw.com, Jay Marshall Wolman jmw@randazza.com

Gentlemen,

We are in receipt of Mr. Hardin's supplemental objections to our 17 USC § 512(h) subpoenas as emailed this afternoon. I will respond more completely when I have had a chance to read thoroughly, but two points require a more urgent response.

First, as to Mr. Hardin: These objections still do not conform to the 2015 amendments to Rule 34. We are willing to temporarily set aside your obligations to follow the Rules of Civil Procedure until the anticipated motion to quash has been received and ruled on by the Court, but we are not waiving our right to receive objections that conform to those rules. Please make sure that you will be able to provide them at that juncture.

Second, and since perhaps I was not fully clear before, we are in no way waiving our right to assert claims directly against the Doe parties. I understood our meet and confer to be a settlement conversation under Rule 408 (and, if going even further, under Sicilian omertà, h/t Marc) discussing one branch of a hypothetical decision tree in which we had otherwise resolved our claims with the individual users. But rest assured, we do still intend to bring claims against these users if we are unable to otherwise resolve the dispute without having to bring an answer and/or potential counterclaims.

With those in mind, I leave you with the agreements Kathryn sent over earlier for your review, suggestions, or agreement.

I remain,
LH

From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Monday, May 18, 2026 5:56 PM
To: Lane Haygood <lhaygood@kusklaw.com>
Cc: Marc Randazza <mjr@randazza.com>; Kathryn Tewson <ktewson@kusklaw.com>; matt@matthewhardin.com <matt@matthewhardin.com>; Thom Prince <tprince@kusklaw.com>; Jay Marshall Wolman <jmw@randazza.com>
Subject: Re: Meet and Confer

Folks,

Attached is a letter more fully explaining our objections and addressing Mr. Haygood's earlier "deficiency" letter.

I am also attaching, in redacted form, the records for which we are not asserting that the process of conducting a search itself would be overly burdensome. These documents are provided in redacted form so that you can tell what sort of records Lolcow LLC possesses which are readily available. As to the redactions, you will see that we are shielding the IP addresses and email addresses for the particular users. This information is being shielded for the reasons set forth in this correspondence and in our earlier correspondence. We also do not wish to prejudice the individual users or their newly-retained counsel, should those users seek to quash the subpoena on the grounds of fair use, the first amendment, etc.

Best,

Matthew D. Hardin
 DC: 202-802-1948
 NYC: 212-680-4938
 Email: MatthewDHardin@protonmail.com

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On May 13, 2026, at 3:55 PM, Matthew Hardin <HardinLawPLLC@icloud.com> wrote:

Mr. Haygood,

Thanks for the meet and confer this afternoon. As we discussed, I'll expect that you will send a letter motion to adjourn all extant deadlines by one week (both for us to respond to your subpoenas or make any applicable motions, and for you to Answer the complaint). I also appreciate your agreement that I can get you a clarified letter regarding our objections on May 18 rather than May 15.

Best,

Matthew D. Hardin
 DC: 202-802-1948
 NYC: 212-680-4938
 Email: MatthewDHardin@protonmail.com

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On May 8, 2026, at 7:20 PM, Lane Haygood <lhaygood@kusklaw.com> wrote:

I can do next Wednesday afternoon. I've got an argument in our high criminal court that morning but I'll be driving back from Austin after that. Thursday is a bad day for me.

From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Friday, May 8, 2026 6:19 PM
To: Marc Randazza <mjr@randazza.com>
Cc: Lane Haygood <lhaygood@kusklaw.com>; Kathryn Tewson <ktewson@kusklaw.com>; matt@matthewhardin.com <matt@matthewhardin.com>; Thom Prince <tprince@kusklaw.com>; Jay Marshall Wolman <jmw@randazza.com>
Subject: Re: Meet and Confer

I'll wait to hear on a specific time. Thanks,

Matthew D. Hardin
DC: 202-802-1948
NYC: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On May 8, 2026, at 4:42 PM, Marc Randazza <mjr@randazza.com> wrote:

No good, im in an appeal ... gonna have to wait til next weds or thurs

On Fri, May 8, 2026 at 4:27 PM Lane Haygood <lhaygood@kusklaw.com> wrote:

Works for me. What time?

Get [Outlook for Mac](#).

From: Matthew Hardin <hardinlawpllc@icloud.com>
Date: Friday, May 8, 2026 at 3:17PM
To: Lane Haygood <lhaygood@kusklaw.com>
Cc: Marc Randazza <mjr@randazza.com>; Kathryn Tewson <ktewson@kusklaw.com>; matt@matthewhardin.com <matt@matthewhardin.com>; Thom Prince <tprince@kusklaw.com>; Jay Marshall Wolman <jmw@randazza.com>
Subject: Re: Meet and Confer

How about Tuesday?

Matthew D. Hardin
DC: 202-802-1948
NYC: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On May 8, 2026, at 3:09 PM, Lane Haygood <lhaygood@kusklaw.com> wrote:

I am in a protective order hearing at the moment. I do not think we will get done in the next hour which I why I set it for 4:00 p.m. for the maximum amount of padding to my schedule. I am fine with rescheduling for a different date. What day works for everyone else?

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From: Marc Randazza <mjr@randazza.com>
Date: Friday, May 8, 2026 at 2:04PM
To: Lane Haygood <lhaygood@kusklaw.com>
Cc: Matthew Hardin <hardinlawpllc@icloud.com>; Kathryn Tewson <ktewson@kusklaw.com>; matt@matthewhardin.com <matt@matthewhardin.com>; Thom Prince <tprince@kusklaw.com>; Jay Marshall Wolman <jmw@randazza.com>
Subject: Re: Meet and Confer

Hey all, I fucked up and saw 4pm and thought 4 Eastern, even though you were clear it was 4 central.

We can't do 5 eastern.

Accordingly, would everyone accommodate my stupidity by advancing this to 4 Eastern? Or we can reschedule for another day.

On Thu, May 7, 2026 at 8:23 PM Lane Haygood <lhaygood@kusklaw.com> wrote:

Lane Haygood is inviting you to a scheduled Zoom meeting.

Topic: Lane Haygood's Zoom Meeting
Time: May 8, 2026 04:00 PM Central Time (US and Canada)
Join Zoom Meeting
<https://us02web.zoom.us/j/87840928371>

Meeting agenda
<https://docs.zoom.us/agenda/doc/a49d4b1c-0b52-4a9e-8090-fd57e5fedc9e>

Meeting chat link
<https://us02web.zoom.us/jc/87840928371>

Meeting ID: 878 4092 8371

One tap mobile
+13462487799,,87840928371# US (Houston)
+17193594580,,87840928371# US

Join by SIP
• 87840928371@zoomcrc.com

Join instructions
https://us02web.zoom.us/join/87840928371?signature=EsoR1nJYVouxTU_T6YjNOHiNiLgh2WPM7Z5RvQzpAeo

From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Thursday, May 7, 2026 7:01 PM
To: Marc Randazza <mjr@randazza.com>
Cc: Lane Haygood <lhaygood@kusklaw.com>; Kathryn Tewson <ktewson@kusklaw.com>; matt@matthewhardin.com <matt@matthewhardin.com>; Thom Prince <tprince@kusklaw.com>
Subject: Re: Meet and Confer

I'll assume that Ms. Tewson will send a zoom link for this?
Thanks,

Matthew D. Hardin
DC: 202-802-1948
NYC: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On May 7, 2026, at 7:56 PM, Marc Randazza <mjr@randazza.com> wrote:

4pm works for me

On Thu, May 7, 2026 at 7:34 PM Lane Haygood <lhaygood@kusklaw.com> wrote:

Mr. Hardin:

We are unaware of the correspondence of which you speak. However, if Marc would like to join us I have no objections to that. What say you, Marc?

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From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Thursday, May 7, 2026 6:28:00 PM
To: Kathryn Tewson <ktewson@kusklaw.com>
Cc: matt@matthewhardin.com <matt@matthewhardin.com>; Lane Haygood <lhaygood@kusklaw.com>; Thom Prince <tprince@kusklaw.com>; Marc Randazza <mjr@randazza.com>
Subject: Re: Meet and Confer

That's fine with me. Given the correspondence we received earlier today, though, I think Mr. Randazza should also be included. He asked to meet and confer too. I'm obviously not able to speak for his schedule.

Matthew D. Hardin
DC: 202-802-1948
NYC: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On May 7, 2026, at 7:26 PM, Kathryn Tewson <ktewson@kusklaw.com> wrote:

Matthew,

Apologies for the late response. I have been asked to request a 4 PM Central / 2 PM Pacific timeslot tomorrow, if you are available. Lane asked me to indicate that he believes it would be helpful to discuss some of the issues your objections raised even prior to receiving the updated objections.

Thanks,

Kathryn Tewson, Paralegal
T E W S O N
K U S K L A W

Kamerman, Uncyk, Soniker & Klein P.C.
206-940-3701

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From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Wednesday, May 6, 2026 10:39 AM
To: Kathryn Tewson <ktewson@kusklaw.com>
Cc: matt@matthewhardin.com <matt@matthewhardin.com>; Lane Haygood <lhaygood@kusklaw.com>; Thom Prince <tprince@kusklaw.com>
Subject: Re: Meet and Confer

Good afternoon,

If you'd like to meet via zoom this week, I am available Friday anytime after about 11 am. I do note that it may make more sense to allow the supplemental information requested in Mr. Haygood's May 1 correspondence to be provided (May 15) before a conferral, and therefore my suggestion would be that we pencil something in for May 18 or 19 (the first two business days after the supplemental letter will have been received). But I defer to you on that.

Best,

Matthew D. Hardin
DC: 202-802-1948
NYC: 212-680-4938
Email: MatthewDHardin@protonmail.com

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On May 5, 2026, at 8:37 PM, Kathryn Tewson <ktewson@kusklaw.com> wrote:

Matt,

Lane asked me to reach out to you to schedule our meet and confer. As Lane is in Texas, Thom is in North Carolina, and I am in Washington State, it is our office's practice to handle these meetings via Zoom, Teams, Google Meet, or other videoconferencing platform. What does your availability look like this week, and do you have a preferred meeting platform?

Best,

Kathryn Tewson, Paralegal
Kamerman, Uncyk, Soniker & Klein P.C.
206-940-3701

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