

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MEANITH HUON,)	
)	
	Plaintiff,	
v.)	CIVIL ACTION NO.: 1: 11-cv-3054
)	
)	
David Lat, et. al.)	
)	
	Defendants	
)	

**MOTION TO REPLACE EXHIBIT “H” TO
PLAINTIFF MEANITH HUON’S RESPONSE TO
THE ABOVE THE LAW DEFENDANTS’ MOTION TO DISMISS (DOCKET NO. 194)**

Plaintiff, Meanith Huon, states as follows:

1. Plaintiff previously filed a Motion to Strike the names and personally identifying information of the complaining witness and witnesses in the original proceedings to protect their privacy of and to prevent embarrassment. Docket Nos. 50 and 74.

2. That Motion was granted:

MINUTE entry before Honorable Jeffrey T. Gilbert: Oral argument held on 10/11/11 on pending motions. Plaintiff's Amended Motion to Strike Exhibit B to Defendants' Memorandum 50 is granted to the extent it contains personally identifying information such as names, addresses or social security numbers from people who are not parties to this case . . . Docket No. 74.

3. On March 12, 2013, Plaintiff filed Exhibit “H” to his Response to the Above the Law Defendants’ Motion to Dismiss. (Attachment 15 to Docket No. 194.)

4. Attachment “H” is the assistant state’s attorney’s Chris Hoell’s Answers to Interrogatories in the civil action Huon v. Madison County, et. al. 3:12-cv-00166 (S. D. of Illinois), now set for trial on September 3, 2013. Mr. Hoell prosecuted Mr. Huon in the original

criminal proceedings that resulted in Mr. Huon's acquittal. Mr. Hoell states in his Answers to Interrogatories No. 9 and 11 that he "did not recall mentioning that there was potentially a prior victim" and admitted to having a "conversation he had with a woman who runs Lawyergossip.com"-- a website that, on information and belief, was created *after* Mr. Huon's arrest and became inactive *after* Mr. Huon's acquittal.

5. The Above the Law rape story cited to Lawyergossip.com as a source.

6. Plaintiff, Meanith Huon, inadvertently disclosed the name of the complaining witness and witnesses at trial in Exhibit "H".

7. In addition, Exhibit "H" should have included the emails Mr. Huon received from the owner of the site Lawyergossip.com but did not, including the following email: "Listen asshole, i know you're out on bail, I'll be contacting the prosecutor handling your case and your bail will be revoked. Enjoy your freedom because you'll be back in jail soon enough."

8. Plaintiff seeks to replace Exhibit "H" with the attached proposed redacted and corrected Exhibit "H", redacting the names of the complaining witnesses and three witnesses at trial who are not police officers or affiliated with the law enforcement and including the emails from the owner of Lawyergossip.com.

9. Plaintiff has no objection to counsels for the Defendants having access to the unredacted copy of Exhibit "H" and no objection to counsel for Defendants' counsel needing additional time to reply, as a result of any delay caused by his inadvertent filing of Exhibit "H".

10. In addition, on a separate note, Exhibit "F" to Mr. Huon's Response to the Gawker's Defendants' Motion to Dismiss inadvertently omitted a copy of the *Los Angeles Times* article, dated May 20, 2011, entitled "*Schwarzenegger child: How Gawker named wrong 'baby mama'*". That article can be found on the Los Angeles Times blog located at

http://latimesblogs.latimes.com/.m/the_big_picture/2011/05/schwarzenegger-child-gawker-names-wrong-baby-mama.html?p=3. Mr. Huon is not seeking leave to file a replacement

Exhibit “F”.

WHEREFORE, Plaintiff, Meanith Huon, requests that this Honorable Court enter an Order:

1. Granting Plaintiff leave to replace Exhibit “H” ” to his Response to the Above the Law Defendants’ Motion to Dismiss (Attachment 15 to Docket Number 194) with the attached proposed redacted and corrected Exhibit “H”.
2. Order the Clerk to remove Exhibit “H” (Attachment 15 to Docket Number 194).

Respectfully Submitted,

By: /s/ Meanith Huon /s/
Meanith Huon

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**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MEANITH HUON,)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 11-3050
)	
)	JURY TRIAL DEMANDED
)	
FORMER MADISON COUNTY STATE'S)	
ATTORNEY WILLIAM MUDGE, et. al.)	

CERTIFICATE OF SERVICE

Under penalties of law, I attest the following documents or items have been or are being electronically served on all counsel of record for all parties on March 17, 2013:

**MOTION TO REPLACE EXHIBIT "H" TO
PLAINTIFF MEANITH HUON'S RESPONSE TO
THE ABOVE THE LAW DEFENDANTS' MOTION TO DISMISS (DOCKET NO. 194)**

Respectfully submitted,
/s/ Meanith Huon
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