



motion for leave to file a brief in excess of 15 pages, without filing the actual brief with its motion. The Jezebel.com Defendants never noticed up their motion.

5. **After** a briefing schedule was entered on the Motion to Dismiss of the Above The Law Defendants, the Jezebel.com Defendants filed a Motion to Dismiss and Supporting Memorandum totaling **31** pages and with exhibits. The Jezebel.com Defendants did not file a Notice of its Motion to Dismiss.
6. Plaintiff filed a motion to present the Jezebel.com Defendants' Motion to Dismiss, as a courtesy, after contacting counsel for the Jezebel.com Defendants to advise them that they never filed Notice of motions to present their motions.
7. The Jezebel.com Defendants then filed two Notice of motion setting their motions for hearing on November 10, 2011 (Document No. 62 and 63.).
8. The Jezebel.com Defendants have now filed an Amended Notice and a Response brief asking that the Court set a briefing schedule on a much shorter schedule and with an earlier November hearing date than previously set with respect to The Above The Law Defendants in December.
9. The Jezebel.com Defendants refer in their Response brief to this lawsuit as being a strategic lawsuit against public participation (SLAPP). On information and belief, a SLAPP is a lawsuit that is intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition.  
  
[http://en.wikipedia.org/wiki/Strategic\\_lawsuit\\_against\\_public\\_participation](http://en.wikipedia.org/wiki/Strategic_lawsuit_against_public_participation)
10. Mr. Huon is a pro se plaintiff who was falsely accused of a crime and acquitted. The Jezebel.com Defendants maintained a website and posted a story calling him a

“Rapist” with his photograph and published a comment encouraging readers to Google his phone number and contact him.

11. Mr. Huon has not hired a litigation boutique or a major law firm to file a lawsuit to burden the Defendants with the cost of litigation. Mr. Huon has extended every courtesy to the defendants, including not opposing every request for extension of time by The Above The Law Defendants. Mr. Huon filed a motion to present the Jezebel.com Defendants whose counsel filed three separate Notice of Motions for the same motion. Defendants’ Motion to Dismiss would not have even been presented this soon, had Mr. Huon not notify the parties’ counsels and the Court.
12. Mr. Huon is a pro se plaintiff who has filed a lawsuit against the Jezebel.com Defendants, which include Gawker Media. On information and belief, Gawker Media is an American online media company and blog network, founded and owned by Nick Denton based in New York City. It is considered to be one of the most visible and successful blog-oriented media companies. As of March 2010, it is the parent company for 11 different weblogs: Gawker.com, Fleshbot, Deadspin, Lifehacker, Gizmodo, Kotaku, Jalopnik, Jezebel, Gawker.tv, and Cityfile. See [http://en.wikipedia.org/wiki/Gawker\\_Media](http://en.wikipedia.org/wiki/Gawker_Media).
13. On information and belief, in the February 20, 2006 issue of New York Magazine, Jossip founder David Hauslaib estimated Gawker.com's annual advertising revenue to be at least \$1 million two years ago, and possibly over \$2 million a year. Combined with low operating costs — mostly web hosting fees and writer salaries — Denton was already believed to be turning a healthy profit in 2006. In 2009, the corporation was estimated to be worth \$300 million, with \$60 million in advertising revenues and

more than \$30 million in operating profit.

[http://en.wikipedia.org/wiki/Gawker\\_Media](http://en.wikipedia.org/wiki/Gawker_Media).

14. The only efforts taken to censor, intimidate, and silence critics by burdening them with the cost of a legal defense until they abandon their criticism or opposition has been the actions of the Jezebel.com Defendants in retaining a prominent law firm to aggressively litigate this case, including arguing over the number of days to respond to a motion. Defendants retained two sets of law firms, one in New York and one in Chicago. The only efforts to burden a party has been by the Jezebel.com Defendants in filing multiple Notices of motions with different court dates, creating confusion. Defendants have local counsel that should be familiar with the local rules and electronic filing. Defendants' recent Response brief was filed twice as Doc. Nos. 66 and 67.
15. The defamatory content regarding Mr. Huon remains in place.
16. With respect to the comments by counsel for the Jezebel.com Defendants about Mr. Huon not being a plumber, prisoner, or like other pro se plaintiff, many plumbers and pro se plaintiff's don't spend their life's savings to defend themselves against false charges only to have to raise the funds to litigate a lawsuit against a media empire that is in the business of generating advertising revenue by making fun of people's misfortunes and defaming them. This is not journalism. Unfortunately, pro prisoners don't have the resources to litigate against media companies with the resources to hire a prominent litigation boutique or to defend against false accusations, which may be the reason why they are in prison.
17. The hearing date in this matter on The Above The Law Defendants' Motion to

Dismiss is December 22, 2011. Defendants would suffer no prejudice since their website continues to defame Mr. Huon by republishing the defamatory content worldwide on the Internet, generating more traffic to their website.

WHEREFORE, Plaintiff, Meanith Huon, requests that this Honorable Court:

1. Enter and continue the Motion to Dismiss of the Jezebel.com generally, pending the Court's ruling on The Above the Law Defendants' Motion to Dismiss and excuse Plaintiff from having to respond until further order of Court.
2. In the alternative, Plaintiff requests that this Court grant him leave to file a Response Brief to the Jezebel.com Defendants' Motion and 27-page Memorandum in excess of 15 pages (but no more than 27 pages) and to give Plaintiff 60 days, until, November 30, 2011 to file a Response Brief to the Jezebel.com's Motion to Dismiss.

Respectfully Submitted,

By: /s/ Meanith Huon  
Meanith Huon

Meanith Huon  
ARDC No.: 6230996  
PO Box 441  
Chicago, IL 60690  
312-405-2789  
huon.meanith@gmail.com



