

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

CHILDREN’S HEALTH DEFENSE,
TRIALSITE, INC., CREATIVE
DESTRUCTION MEDIA, LLC,
ERIN ELIZABETH FINN, JIM HOFT,
DR. BEN TAPPER, BEN SWANN,
DR. JOSEPH MERCOLA, TY
BOLLINGER, CHARLENE
BOLLINGER, AND JEFF CROUERE,

Plaintiffs,

v.

WP COMPANY, LLC D/B/A THE
WASHINGTON POST, THE BRITISH
BROADCASTING CORP., THE
ASSOCIATED PRESS & REUTERS
NEWS AND MEDIA INC.,

Defendants.

CIVIL ACTION NO. 3:23-cv-00720

Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

**PLAINTIFFS’ OPPOSED ALTERNATIVE
MOTION FOR JURISDICTIONAL DISCOVERY
AND TO HOLD IN ABEYANCE THE BBC’S RULE 12(b)(2) MOTION**

Plaintiffs file this Motion for Jurisdictional Discovery of The British Broadcasting Corp. (“BBC”) pursuant to Federal Rules of Civil Procedure 26(d)(1), 30, and 33 and, in the event the Court does not immediately deny the BBC’s Rule 12(b)(2) Motion to Dismiss (ECF No. 39-1), request that the Court issue an order for them to take such discovery within 90 days of its issuance. This motion is accompanied by (i) a memorandum that sets forth Plaintiffs’ supporting arguments

and authorities, and (ii) a declaration of Scott J. Street, with supporting exhibits. A printed courtesy copy of these documents will be delivered to the Court's chambers.

WHEREFORE, in the event the Court does not immediately deny the BBC's Rule 12(b)(2) Motion to Dismiss, Plaintiffs respectfully request the Court authorize them to take pre-Rule 26(f) jurisdictional discovery of the BBC within 90 days of its order, and grant further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

DATED: August 15, 2023

/s/ G. Shelly Maturin, II

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LR7.4.1 CERTIFICATE

Pursuant to local rule, Plaintiffs' reached out to all opposing counsel via email seeking consent to file the foregoing Motion. All opposing counsel have voiced opposition to the filing of the instant Motion.

/s/ G. Shelly Maturin, II

G. SHELLY MATURIN, II

CERTIFICATE OF SERVICE

This is to certify that on the 15th day of August, 2023, a true and correct copy of the above and foregoing was filed with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all attorneys of record.

/s/ G. Shelly Maturin, II

G. SHELLY MATURIN, II