

No. 15-2186-CV

RONALD F. AVERY

*

IN THE DISTRICT COURT

*

VS.

*

GUADALUPE COUNTY, TEXAS

*

*

DYLAN BADDOUR;
HEARST COMMUNICATIONS,
INC.

*

*

2nd 25TH JUDICIAL DISTRICT

**PLAINTIFF'S ADDENDUM #1 TO PLAINTIFF'S
AFFIDAVIT IN SUPPORT OF HIS RESPONSE TO
DEFENDANT'S
MOTION TO DISMISS**


STATE OF TEXAS §
GUADALUPE COUNTY §

Before me, the undersigned notary, on this day personally appeared Ronald F. Avery, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

1. My name is Ronald Franklin Avery. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
2. I went to the Defendants' web article concerning me and the "Republic of Texas" on February 26, 2016 and found there that the third picture was still there showing me at the microphone reading my paper on dissolution and its implications to the "Republic of Texas."
3. The caption below the picture reads as follows: "In April, the Texian congress assembled beneath the blue-and-yellow flag of the old Republic, on the dance floor of the shuttered Silver Eagle Taphouse near the banks of the Guadalupe River in McQueeney. **They follow a speaker list, and members take turns at the microphone.** In this photo, an individual lists grievances with the U.S., including the 2008 bank bailout, NSA surveillance, the "police state" and "immoral wars."" (Bolding added).
4. This photo and the caption beneath it clearly indicate that Plaintiff is a member of the "Republic of Texas," which is false.
5. Plaintiff discussed this photograph #3 continuing to show the Plaintiff as a member of the "Republic of Texas" even after their so-called "correction" in Plaintiff's Verified Response to Defendants' Motion to Dismiss at page 10.

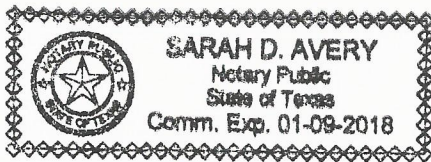
6. **Plaintiff's Affidavit Exhibit G** shows the same photograph with the Plaintiff being identified as "Ronald Avery."
7. Plaintiff's **Addendum #1 Exhibit I**, attached hereto, shows the same picture but with the person at the microphone identified as "an individual." But this clearly indicates I am still a member of the "Republic of Texas."

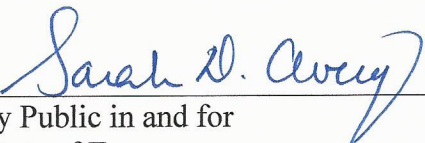
Further the Affiant sayeth not.



Ronald F. Avery

Sworn to and subscribed before me by Ronald F. Avery on February 29, 2016





Notary Public in and for
The State of Texas

My commission expires: 01.09.2018

CERTIFICATE OF SERVICE

I certify that on February 29, 2016, I served a copy of this "Addendum #1 to Affidavit of Ronald F. Avery in Support of His Response to Defendant's Motion To Dismiss" on the parties listed below by Certified Mail RRR 7009 0960 0000 7721 9551:

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Ronald F. Avery, Pro Se

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Ever hopeful and determined, Texas secessionists face long, long odds

By Dylan Baddour | September 13, 2015 | Updated: November 9, 2015 4:42pm

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Photo: Pu Ying Huang

IMAGE 3 OF 10

In April, the Texian congress assembled beneath the blue-and-yellow flag of the old Republic, on the dance floor of the shuttered Silver Eagle Taphouse near the banks of the Guadalupe River in McQueeney. They follow a speaker list, and members take turns at the microphone. In this photo, an individual lists grievances with the U.S., including the 2008 bank bailout, NSA surveillance, the "police state" and "immoral wars." [less](#)

EXHIBIT I

Everyone has seen the bumper stickers: "Secede Texas." It's an age-old jest in the Lone Star State. But some people take it seriously.