No. 15-2186-CV

RONALD F. AVERY

* IN THE DISTRICT COURT

*

VS.

* GUADALUPE COUNTY, TEXAS

*

DYLAN BADDOUR;

* HEARST COMMUNICATIONS,
INC.

* 2nd 25TH JUDICIAL DISTRICT

Request for Court Record

Now comes, Plaintiff, Ronald F. Avery, and makes this his Request for the Record to be sent to the Fourth Court of Appeals in Bexar County, Texas. The Honorable Judge, Bud Kirkendall, dismissed the above styled case by signed order on March 18, 2016.

This is an accelerated appeal mandated under the provisions of the Texas Citizen Participation Act (Texas Civil Practice and Remedy Code chapter 27) requiring that the Court file the Record within 10 days of this Notice of Appeal as per Texas Rules of Appellate Procedure 35.1(b).

The Plaintiff requests the following documents to be included in the record sent to the Fourth Court of Appeals:

- 1. Plaintiff's Original Petition and Request for Disclosure (with attached Exhibit A Request for Correction Clarification and Retraction);
- 2. Original Answer of Hearst Communication, Inc. And Dylan Baddour;
- 3. Defendants Hearst Communications, Inc. and Dylan Baddour's Motion to Dismiss Pursuant to the Texas Citizens Participation Act;
- 4. Declaration of Jennifer D. Bishop (with her Exhibits A through T);
- 5. Declaration of Dylan Baddour (with his Exhibits A and B);
- 6. Plaintiff's Verified Response to Defendants' Motion to Dismiss (with his attached Affidavit and Exhibits A through H);
- 7. Plaintiff's Motion for Recusal;

- 8. Defendants Hearst Communications, Inc. And Dylan Baddour's Opposition to Plaintiff's Motion For Recusal;
- 9. Notice of Appearance;
- 10. Order Denying Motion For Recusal;
- 11. Order Setting Hearing (dated 2/22/16);
- 12. Plaintiff's Addendum #1 To Plaintiff's Affidavit in Support of His Response to Defendants' Motion to Dismiss (with its attached Exhibit I);
- 13. Reply Memorandum of Law in Support of Defendants' Motion to Dismiss Pursuant to The Texas Citizens Participation Act;
- 14. Plaintiff's Addendum #2 to Plaintiff's Affidavit in Support of His Response to Defendants' Motion to Dismiss (with his attached Exhibit J);
- 15. Plaintiff's Outline of Oral Argument (including the attached 19 page outline);
- 16. Defendants' Response to Plaintiff's Outline of Oral Argument;
- 17. Order Granting Defendants' Motion to Dismiss Pursuant to The Texas Citizens Participation Act (signed March 18, 2016).

Respectfully submitted,

Ronald F. Avery

Pro Se

1933 Montclair Drive

Seguin, Texas 78155

830/372-5534

taphouse@sbcglobal.net

CERTIFICATE OF SERVICE

I certify that on March 29, 2016, I served a copy of this "Request For Court Record" on the parties listed below by Certified Mail RRR 7009 0960 0000 7721 9582:

Jonathan R. Donnellan
Kristina E. Findikyan
Jennifer D. Bishop
The Hearst Corporation
Office of General Counsel
300 W. 57th Street, 40th Floor
New York, NY 10019
(212) 841-7000
(212) 554-7000 (fax)
jdonnellan@hearst.com
Attorneys for Defendants:

Dylan Baddour and Hearst Communications, Inc.

I also certify that on the same date I emailed the "Request For Court Record" to the

same above and also to:

Jonathan H. Hull Reagan Burrus PLLC 401 Main Plaza, Suite 200 New Braunfels, Texas 78130

Ph: 830/625-8026 Fax: 830/625-4433 jhull@reaganburrus.com

Ronald F. Avery, Pro Se