

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,  
Plaintiff

vs.

Case No. 18CV3122

JAMES FETZER,  
MIKE PALECEK,  
WRONGS WITHOUT WREMEDIES, LLC,  
Defendants.

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AFFIDAVIT OF JACOB ZIMMERMAN IN SUPPORT OF PLAINTIFF'S  
MOTION TO STRIKE DEFENDANT FETZER'S ANSWER

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Jacob Zimmerman, being first duly sworn upon oath, deposes and states as follows:

1. I am one of the attorneys for Plaintiff Leonard Pozner herein, and I make this Affidavit of my own personal knowledge in support of Plaintiff's Notice of Motion and Motion to Strike Defendant Fetzer's Answer.

2. On January 9, 2019, I left Defendant Fetzer a voice message asking him to call me regarding his Answer. Mr. Fetzer returned my call the same day. I explained Plaintiff's position that Mr. Fetzer's answer did not comply with the requirements of Wisconsin's pleading rules. I offered to stipulate to an extension of time to allow him to file a compliant answer. Mr. Fetzer initially indicated his assent to Plaintiff's offer.

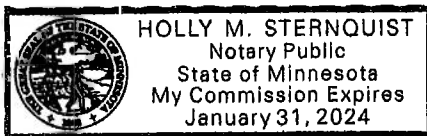
3. Later the same day, Mr. Fetzer left a voicemail saying that he did not need an extension because he has six months to serve an amended answer.

4. Attached as Exhibit 1 is a true and correct copy of a letter sent on behalf of Plaintiff to each Defendant in October of 2018 requesting a full retraction of the defamatory material.

5. Attached as Exhibit 2 is a true and correct copy of a filing styled as "Argument of Amicus Curiae" by Mr. Fetzer in *Leonard Pozner, et al, v. Alex Jones, et al*, Cause No. D-1-GN-18-001842, 345<sup>th</sup> District Court, Travis County, Texas.

6. I have read the foregoing affidavit and acknowledge the contents thereof and affirm I truthfully executed the same for the purposes therein expressed.

FURTHER AFFIANT SAYETH NOT



*Jacob Zimmerman*  
\_\_\_\_\_  
Jacob Zimmerman

Subscribed and sworn to before me on this 18th day of February, 2019.

*Holly M. Sternquist*  
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Notary Public, State of *Minnesota*  
My Commission expires: *1-31-2024*