

MOTION REQUESTING HEARING FOR MOTION TO DISMISS

Months have passed since the submission of this lawsuit within the pandemic time **and because of the happenings this pandemic year I wish to go on record requesting a Hearing on Defense's Motion to Dismiss.** I experienced a Motion to Dismiss Hearing in my still ongoing lawsuit against Altice/News 12 that resulted in my favour denying Altice/News 12 Motion to Dismiss, where Altice/News 12's coverage of me was deemed "outright false" and "unfair" as presented in an Exhibit submitted. Altice/News 12 took down all their coverage of me back in March 2018 after 2 days of their "outright false" and "unfair" news coverage.

However within the case at hand, Defense Hearst/Westport News has not taken their material down for nearly 3 years thereby severely affecting my ability to maintain and gain employment in tune with my history and training. This fact is coupled with the increasingly difficult pandemic economy. Currently I am a person quarantined within a quarantine while awaiting courts actions, for I am unable to sell myself and share my identity because of Google search results showing Hearst's unproven and un-provable hit job upon me for almost 3 years now. Since Hearst/Westport News publishing of the libel at issue, my choice has been either to fight for and save my good name (a name free of any conviction let alone past arrest related to libel as well as free of any witnesses or evidence in general), or if this fight in the forms of my non-frivolous lawsuits are somehow denied then start the processes to change my name at the age of 55 so I can work again. All this takes more time.

I am a strong believer in Hearings because they allow for any questions to be asked so to clear up potential confusions. Confusions have obviously happened to me in the past 3 years within the legal system while dealing with the arrest, false and extreme news coverage, exoneration process, and resulting civil cases I now pursue to clear my name. **I respectfully ask for this Hearing in tune with the courts case loads so I can look back at this experience knowing I was able to provide and give my best efforts possible to clear my name thereby living out my life free of future unjustly unproven and un-provable persecutions. If Covid-19 concerns are relative to granting Hearings then I am completely receptive to a Remote Hearing via Zoom or the like.**

thank you
James Lawrence
November 23, 2020