

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

WESTERN DIVISION

Civil Action No. 5:24-cv-00644

MARK KEITH ROBINSON,)

Plaintiff,)

v.)

CABLE NEWS NETWORK, INC. and)
LOUIS LOVE MONEY,)

Defendants.)
)
)

REPLY BRIEF IN SUPPORT OF MOTION
TO DISMISS

Comes Now defendant Money and submits this brief reply.

The opposition to Mr. Money's motion is far more telling by seeing what it lacks as opposed to what it includes. The brief lacks:

- (1) An apology to the Court and the defendants for violating Rule 8.
- (2) An explanation for why the Rule was broken by a man who was purporting to be qualified to be the top governmental official in our state, and is currently the Lieutenant Governor. The question of whether the violation was intentional is answered by the lack of explanation – it was Robinson's plan all along to violate a well-known and well-established pleading rule through his very experienced attorneys.

- (3) An explanation for why Mr. Robinson’s campaign publicly called the amendment to the Complaint “legalese” in an effort to eliminate any efficacy the amendment had. Moreover, Robinson did not distance himself from his campaign’s comments or deny that they were made with his permission.
- (4) Any type of proposed alternative sanction. To that end, Mr. Robinson says in his brief that Money has not been harmed by the violation. That is not the case, as the publicity Robinson caused is detrimental to Money’s defense and the ability to obtain a fair jury. And, a sanction is not compensatory damages – they are not the same thing. A sanction is necessary to prevent a future litigant from violating the rule, then amending when called on it, but then announcing that the amendment is due to mere “legalese” and the prayer for relief in the original complaint is valid.

Something has to be done. Mr. Robinson’s behavior is not appropriate. He violated a rule, made a spectacle of it, only fixed it when called out, then announced the fix was not sincere through his campaign. He has offered no other solution. Thus, Money asks that his case be dismissed. Alternately, Money asks for a mere 1% of what Robinson says his case is worth - \$500,000, less than the prejudgment interest would be on a \$50,000,000 award.

This the 5th day of December 2024.

/s/ Andrew L. Fitzgerald
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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served a copy of the foregoing REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS upon all other parties to this action by electronically filing with the File & Serve System which will send electronic notification to the following:

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This the 5th day of November 2024.

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