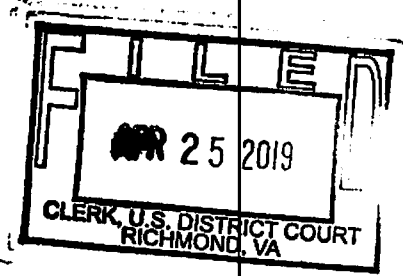


IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S MOTION FOR LEAVE TO
EXTEND TIME TO RESPOND TO SECOND
AMENDED MOTION TO INTERVENE

**DEFENDANT'S MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO
SECOND AMENDED MOTION TO INTERVENE**

Comes now Defendant Jason Goodman, Pro Se to move this honorable Court for an extension of time to respond to Intervenor Applicant's second amended motion to intervene for the following reasons.

1. Intervenor Applicant and an array of coordinated on-line "cyber confederates" including non-party Keven Alan Marsden (MARSDEN) have collectively publicly referred to Defendant Goodman as a "money changer" and a "rat" well known stereotypical disparagements for people, like Defendant, of the Jewish faith. Further, and without evidence, Intervenor Applicant has echoed if not originated the false statements of Plaintiff Steele, accusing Defendant of being an operative of Israeli Mossad and a Zionist. It is Defendant's belief that this is done to foment hatred towards Defendant among rabid anti-Jewish viewers on the internet and to discourage

1 fence sitters from financially or otherwise supporting the journalistic and business
2 endeavors of Defendant. These points serve as relevant background for the latest
3 despicable strategic move to financially and legally cripple Defendant in this ongoing
4 vexatious litigation. The most recent of Intervenor Applicant's repeated amendments
5 to his factually illegitimate applications to intervene now comes in precise
6 coordination with one of the most sacrosanct holidays in the Jewish faith and one of
7 the only that Defendant observes with family and friends, the 8 days of Pesach. It is
8 defendant's belief that this was done specifically to frustrate Defendant's ability to
9 balance the personal matters of family life and business with the pressing need for a
10 timely response to Intervenor Applicant's abusive and inappropriate application for
11 intervention.
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13

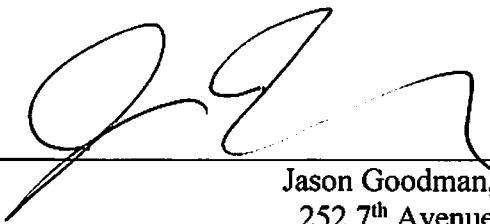
14 2. Time to respond has not yet expired

15 3. Intervenor Applicant published two videos on YouTube on April 20, 2019 visually
16 and verbally indicating that he is preparing yet another pleading in this matter.

17
18 **(EXHIBIT A)** (<https://www.youtube.com/watch?v=EggqxJOcH1I&t=2s> and
19 <https://www.youtube.com/watch?v=Z3A1fvBZwtE&t=2s>) This is suggestive of yet
20 another forthcoming amendment to the Motion to Intervene. It should also be noted
21 that during these videos Intervenor Applicant references the Defendant in the context
22 of him being run over by a train and having his "legs cut off" and his legs being
23 "cauterized so you won't bleed to death". These are just the most recent in a two-
24 year long series of daily videos created by the Intervenor Applicant with the apparent
25 intent to threaten, intimidate and otherwise harass Defendant.
26
27

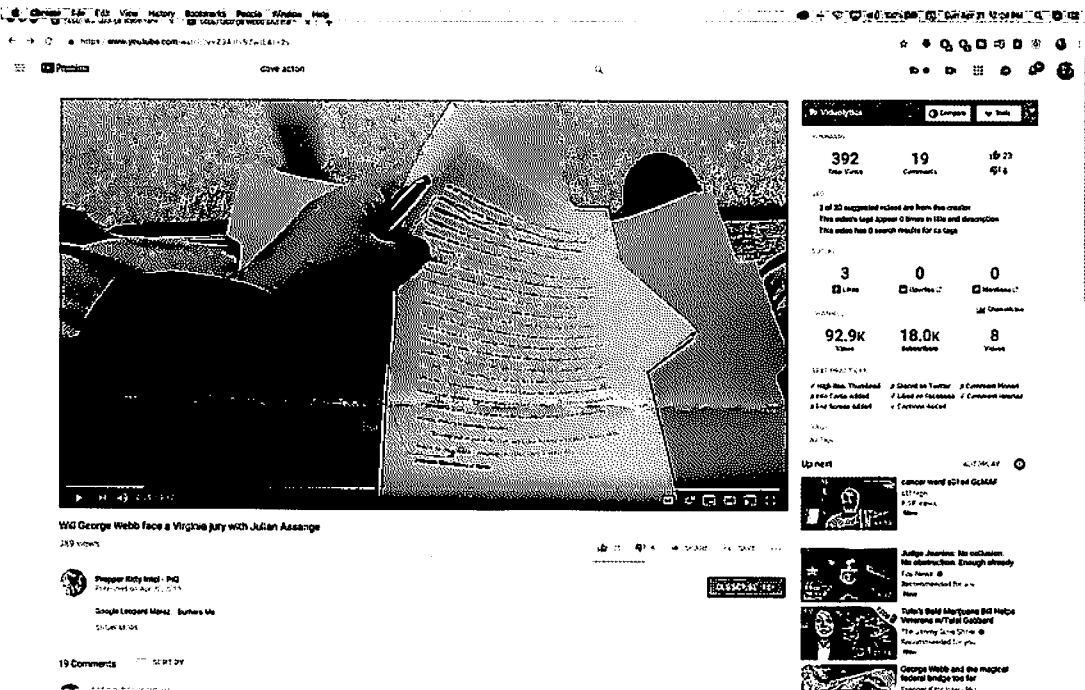
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WHEREFORE, Defendant Goodman hereby requests that the Court enter an Order granting Motion for an Extension of Time and providing Defendant with an extension of time to file a response to Intervenor Applicant's second Amended Motion to intervene.



Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
truth@crowdsourcethetruth.org

EXHIBIT A



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

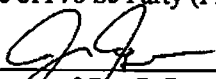
I declare under penalty of perjury that:

motion for leave to extend time to respond to
second amended motion to intervene

No attorney has prepared, or assisted in the preparation of _____
(Title of Document)

JASON GOODMAN

Name of *Pro Se* Party (Print or Type)


Signature of *Pro Se* Party

Executed on: April 21, 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)

Circuit Court for Eastern Divistion Virginia **Case No.** 3:17-cv-601-MHL
City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue 6s

VS.

Street Address **Apt.#**

Street Address **Apt.#**

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City **State** **Zip Code** **Area Telephone**

City **State** **Zip Code** **Area Telephone**

Plaintiff

Defendant

CERTIFICATE OF SERVICE
(DOMREL58)


I HEREBY CERTIFY that on this 21 day of April, 2019, a copy of the document(s) entitled Motion for leave to extend time to responde to 2nd amended motion to intervene was/were mailed, postage prepaid to:

Title of Document(s)

D. George Sweigert
Opposing Party or His/Her Attorney

PO Box 152
Address
Mesa, AZ 85211
City State Zip

April 21, 2019
Date


Signature

Circuit Court for Eastern Divistion Virginia **Case No.** 3:17-cv-601-MHL
City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue 6s

VS.

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OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City **State** **Zip Code** **Area Code** **Telephone**

City **State** **Zip Code** **Area Code** **Telephone**

Plaintiff

Defendant

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(DOMREL58)

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was/were mailed, postage prepaid to: **Title of Document(s)**

Steven Biss


Opposing Party or His/Her Attorney

300 West Main St Suite 102

Address

Charlottesvill, VA 22903
City **State** **Zip**

April 21, 2019
Date


Signature

Circuit Court for Eastern Division Virginia **Case No.** 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

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(DOMREL58)**

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Title of Document(s)

Terry C Frank


Opposing Party or His/Her Attorney

Kaufman & Canoles 1021 E Cary St 14th floo

Address

Richmond VA 23219
City State Zip

April 21, 2019
Date


Signature

Circuit Court for Eastern Division Virginia **Case No.** 3:17-cv-601-MHL
City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

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Name

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Defendant

VS.

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(DOMREL58)

I HEREBY CERTIFY that on this 21 day of April, 2019, a copy of the document(s) entitled Motion for leave to extend time to responde to 2nd amended motion to intervene was/were mailed, postage prepaid to: **Title of Document(s)**

Susan "Queen Tut" Lutzke

Opposing Party or His/Her Attorney

2608 Leisure Dr

Address

City FT Collins **State** CO **Zip** 80525

April 21, 2019
Date

[Signature]
Signature