

6. That there is no valid excuse or justification for the defendant's failure to provide the required disclosures as the court has granted every single protective order the defendant has asked for since the inception of this case.

7. That the defendant is playing games with this court.

8. That the defendant's actions are a willful and flagrant violation of this court's previous order entered on the defendant's motion. This court should incarcerate the defendant in the Cleburne County Detention Center until he complies with this court's orders and answers discovery. In the alternative, this court should sanction the defendant as appropriate and just.

9. That the defendant's actions are a willful and flagrant violation of this court's previous order entered on the defendant's motion. This court should incarcerate the defendant in the Cleburne County Detention Center for flaunting the dignity and authority of this court. In the alternative, this court should sanction the defendant as appropriate and just.

10. That this court should again order great compliance with discovery and compel the defendant to fully answer discovery.

11. That the plaintiff has retained an expert, Garrett Ziegler, and counsel for the plaintiff can not adequately prepare for trial, conduct discovery, or utilize her experts under the current protective order because Mr. Biden will not answer discovery. This court should modify the scheduling order.

12. That Mr. Biden, who has never appeared before this court to answer for his repeated filing of spurious motions for protective orders and contemptuous

acts, should be order to appear and show cause as to why he has requested protective orders, been granted those orders, and still not complied with those orders.

13. That the defendant, who holds a Juris Doctor from Yale Law School, is engaging in vexatious litigation practices, has intentionally frustrated the litigation, and forced the plaintiff to incur excessive attorney's fees. This court should order that the defendant pay the plaintiff's attorney's fees and costs related to his conduct as detailed in this motion.

WHEREFORE the plaintiff moves this honorable court to find the defendant in contempt; compel discovery; modify the scheduling order; for sanctions; for attorney's fees and costs; and for all other just and proper relief.

Respectfully Submitted,

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By: /S/ JENNIFER M. LANCASTER
Jennifer M. Lancaster, 2011178

CERTIFICATE OF SERVICE

By my signature above, I certify pursuant to Ark. R. Civ. P. 5(e) that a copy of the foregoing has been delivered by the below method to the following person or persons:

First Class Mail Facsimile Email AOC/ECF Hand Delivery

Brent Langdon

on this ___ DAY of APRIL, 2023.