

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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In Re:) **Civil Action No. 4:25-cv-02057 (LHR)**
))
ROBERT WYN YOUNG) **Judge Lee H. Rosenthal**
))
Appellant.))
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In Re:) **Chapter 7**
))
ALEXANDER E. JONES) **Bankruptcy Case No. 22-33553 (CML)**
))
Debtor.))
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**APPELLANT’S RULE 8007(b) MOTION FOR STAY
OF PROCEEDINGS PENDING APPEAL**

The undersigned Interested Party~Appellant, **Robert Wyn Young** (“Appellant”, “Interested Party~Appellant”, or “the undersigned”), hereby moves the **District Court**, pursuant to **Fed. R. Bankr. P. 8007(b)**, for a stay, continuance, or suspension of all proceedings in the above~captioned Chapter 7 Bankruptcy Case No. 22-33553 pending resolution of Appellant’s appeal in Civil Action No. 4:25-cv-2057. The grounds for this **Rule 8007(b) Motion for Stay of Proceedings Pending Appeal** are set forth below.

RELEVANT PROCEDURAL HISTORY

1. The Request for Intervention

On March 19, 2025, the undersigned filed a **Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment** in Case No. 22-33553. (Docket 1120) On April 8, 2025, the Connecticut Families creditors filed an **Opposition to Motion for Leave to Intervene** (Docket

1124) that failed to comply with the pre-response conference requirements of **BLR 9013-1(g)(1)** and which argued only that the undersigned lacks standing to intervene. On April 11, 2025, the undersigned filed a **Motion to Strike Connecticut Families' Opposition to Motion for Leave to Intervene** (Docket 1126) and a **Reply in Support of Motion for Leave to Intervene** (Docket 1128).

On April 22, 2025, the Bankruptcy Court issued an **Order Denying Motion for Leave to Intervene** (Docket 1129) on the basis of lack of standing, i.e., according to the Bankruptcy Court: “Young has no identifiable economic interest in this case.” and “The concerns raised by Young are adequately represented by existing parties and permitting intervention risks causing undue delay in a case that has been pending since December 2022.” (Docket 1129 at 2)

2. The Filing of an Appeal

On May 4, 2025, the undersigned filed a timely **Notice of Appeal and Statement of Election** appealing the Bankruptcy Court’s April 22, 2025, **Order Denying Motion for Leave to Intervene** (Docket 1129). (Docket 1135) (See, also, Bankruptcy Clerk’s May 7, 2025, **Notice of Filing of an Appeal** and assigning same **Civil Action No. 4:25-cv-2057**, Docket 1138.) Along with the **Notice of Appeal**, the undersigned contemporaneously filed a **Motion for Leave to Appeal Order Denying Intervention**. (Docket 1135-2)

On May 6, 2025, the undersigned filed an electronic **Election to Appeal to Court of Appeals**. (Docket 1136) On May 14, 2025, the undersigned filed **Appellant’s Designation of the Record and Statement of the Issue(s) on Appeal**. (Docket 1143)

On May 15, 2025, the undersigned filed **Appellant’s Request for Certification Under 28 U.S.C. § 158(d)(2)(A)** to pursue a direct and immediate appeal to the Fifth Circuit Court of Appeals. (Docket 1144) No response in opposition to **Appellant’s Request for Certification** was

submitted within the allowable fourteen (14) day period under **Fed. R. Bankr. P. 8006(f)(3)(A)** expiring on May 29, 2025.

On May 21, 2025, the undersigned filed **Appellant's Rule 8007 Motion for Stay of Proceedings Pending Appeal**. (Docket 1153) On May 28, 2025, the Chapter 7 Trustee filed a **Statement of Trustee in Connection with Appeal of Robert Wyn Young** (Docket 1156; S.D. Tex. Docket 2); but no party filed any opposition to **Appellant's Rule 8007 Motion for Stay** prior to, and said motion was **not** yet ripe for decision on, June 5, 2025.

3. The June 5, 2025, Status Conference/Hearing in Case No. 22-33553 (CML)

On June 3, 2025, the Bankruptcy Court's thirty (30) day period of retention of jurisdiction under **Fed. R. Bankr. P. 8006**, following the effective date of the undersigned's appeal, i.e., May 4, 2025 (see Docket 1138), **expired**. On June 5, 2025, the Bankruptcy Court conducted a status conference/hearing and issued an **Order Denying Request for Certification of Direct Appeal and Denying Motion to Stay Pending Appeal** "[f]or the reasons stated on the record at the June 5, 2025, hearing". (Docket 1164)

On June 9, 2025, Appellant filed an AO 435 order for a transcript of the June 5, 2025, status conference/hearing. (Docket 1175) On June 11, 2025, Appellant filed a **Rule 60(B)(4) Motion to Vacate Order Denying Request for Certification of Direct Appeal, Docket 1164** in the District Court (S.D. Tex. Docket 5) on the grounds that, as of June 5, 2025, and under the plain terms of **Fed. R. Bankr. P. 8006(b)**, the Bankruptcy Court lacked subject matter jurisdiction to issue said order, and it is thus properly deemed as **void**. (S.D. Tex. Docket 5 at 1)

Appellant did not wait to receive the transcript of the June 5, 2025, status conference/hearing before filing the aforesaid **Rule 60(B)(4) Motion to Vacate** because the specific, and even the general, reasons for which the Bankruptcy Court denied **Appellant's**

Request for Certification (Docket 1144) on June 5, 2025 (Docket 1164), are **not** actually relevant since, under **Fed. R. Bankr. P. 8006(b)**, the Bankruptcy Court retained jurisdiction with respect to **Appellant’s Request for Certification** for **only thirty (30) days** following the May 4, 2025, effective date of **Appellant’s Notice of Appeal** (see Docket 1135 and 1138), i.e., until **June 3, 2025**. (S.D. Tex. Docket 5 at 4.)

On June 17, 2025, Veritext submitted a **Notice of Electronic Filing** of the “Transcript RE: hearing held on 6/5/25 before Judge Christopher Lopez.” (Docket 1193) Appellant is contemporaneously filing a **Rule 8009(e) Motion for Leave to Supplement the Record on Appeal** with, among other things, the transcript of the June 5, 2025, status conference/hearing in order to evidence the specific reasons for which the Bankruptcy Court denied **Appellant’s Rule 8007 Motion for Stay** (Docket 1153). Such information is required by **Fed. R. Bankr. P. 8007(b)(2)(B)** for the instant **Fed. R. Bankr. P. 8007(b)** motion for stay of all proceedings in Case No. 22-33553 that Appellant herein seeks. Additionally, and in accordance with **Fed. R. Bankr. P. 8007(b)(3)(C)** and S.D. Tex. **Administrative Procedures for Electronic Filing No. 5**, Appellant is attaching herewith as an **Exhibit** relevant portions of the June 5, 2025, status conference/hearing transcript, specifically: Docket 1193; pages 1~2, 7~12, 25~26, 42, 55~57, and 62~63 of 70.¹

In **Appellant’s Request for Certification** (Docket 1144) (which Appellant respectfully submits **remains viable** because the Bankruptcy Court lacked subject matter jurisdiction as of June 5, 2025, to rule on/deny same), the undersigned seeks an immediate and direct appeal to the Fifth Circuit Court of Appeals on the grounds **(1)** that an immediate appeal from the April 22,

¹ Referenced passages of the attached June 5, 2025, status conference/hearing transcript excerpt(s) are highlighted in yellow for convenience.

2025, **Order** denying intervention (Docket 1129) may materially advance the progress or affect the ultimate outcome or **termination** of the instant Chapter 7 case and that certification is, therefore, appropriate under **28 U.S.C. § 158(d)(2)(A)(iii)**, and **(2)** that the **Order** appealed (Docket 1129) involves a matter of **public importance** and that certification for a direct and immediate appeal to the Fifth Circuit Court of Appeals is, therefore, appropriate under **28 U.S.C. § 158(d)(2)(A)(i)**.

In denying **Appellant's Request for Certification** (Docket 1144) (which, again, was done without subject matter jurisdiction), the Bankruptcy Court stated the following:

157(d)(2)(B)(ii) [**sic**] mandates that if any of the four conditions are met, I make the certification, but none of them apply here. It would involve a permissive motion to intervene in both the text and Bankruptcy Rule 2018. And the law in this district is clear that intervention is permissive.

(Docket 1193 at 9) The Bankruptcy Court held that **28 U.S.C. § 158(d)(2)(A)(i)** “doesn’t support certification”, apparently because **Fed. R. Bankr. P. 2018(a)** does not, in the Bankruptcy Court’s view, support the undersigned’s intervention. (Docket 1193 at 9) Further, in holding **28 U.S.C. § 158(d)(2)(A)(iii)** inapplicable, the Bankruptcy Court stated: “an immediate appeal would not advance the progress of this case, which has been pending since 2022.” (Docket 1193 at 9~10) For the foregoing reasons, the Bankruptcy Court denied **Appellant's Request for Certification** (Docket 1144). (Docket 1193 at 10)

Again, Appellant respectfully submits that, as of June 5, 2025, the Bankruptcy Court lacked subject matter jurisdiction to rule on **Appellant's Request for Certification** (Docket 1144) and that **Appellant's Rule 60(B)(4) Motion to Vacate Order Denying Request for Certification of Direct Appeal, Docket 1164** (S.D. Tex. Docket 5) is therefore **well-founded**, and it should be **granted**. However, if the District Court considers any of the Bankruptcy Court’s rationale for denying the **Request for Certification**, then Appellant would note **(1)** that the **Order Denying**

Motion for Leave to Intervene (Docket 1129) involves a matter of **public importance** and that certification for a direct and immediate appeal to the Fifth Circuit Court of Appeals is, therefore, appropriate under **28 U.S.C. § 158(d)(2)(A)(i)**, and **(2)** that an immediate appeal from the April 22, 2025, **Order** denying intervention (Docket 1129) may materially advance the progress or affect the ultimate outcome or **termination** of the instant Chapter 7 case and that certification is, therefore, appropriate under **28 U.S.C. § 158(d)(2)(A)(iii)**. Further, Appellant respectfully submits that the standards for permissive intervention under **Fed. R. Bankr. P. 2018(a)** are **neither** directly **nor** impliedly germane to the standards for certification under **28 U.S.C. § 158(d)(2)(A)(i, ii, and iii)**, which deal entirely with the nature of the matter at issue, **not** the status of the party seeking certification.

In ruling on Appellant's May 21, 2025, **Rule 8007 Motion for Stay** (Docket 1153), the Bankruptcy Court cited In Re First South Savings Association, 820 F.2d 700, 709 (5th Cir. 1987), for the factors to be weighed in deciding whether to grant a stay of proceedings pending appeal, namely, **(1)** whether the movant has made a showing of likelihood of success on the merits, **(2)** whether the movant has made a showing of irreparable injury if the stay is not granted, **(3)** whether the granting of a stay would substantially harm the other parties, and **(4)** whether the granting of the stay would serve the public interest. (Docket 1193 at 11~12)

In regard to factor **(1)**, the Bankruptcy Court stated that it “strongly disagree[s]” that Appellant has made a showing of likelihood of success on the merits. (Docket 1193 at 11) In regard to factor **(2)**, the Bankruptcy Court stated that “there’s been no showing of irreparable injury.” *Id.* In regard to factor **(3)**, the Bankruptcy Court stated:

Whether the granting of a stay would substantially harm the other parties. The answer is no. I think quite frankly it would be harming the trustee’s ability to function throughout this case and quite frankly, Mr. Jones’ ability to proceed as a Chapter 7 debtor.

(Docket 1193 at 12) Finally, in regard to factor (4), the Bankruptcy Court found that a stay of proceedings would **not** serve the public interest. *Id.*

Appellant does **not** dispute that the Bankruptcy Court **retained jurisdiction**, as of June 5, 2025, to rule on the undersigned's May 21, 2025, **Rule 8007 Motion for Stay of Proceedings Pending Appeal** (Docket 1153). However, Appellant respectfully asserts that, under the circumstances of this case, the Bankruptcy Court **erred** in denying the requested stay of proceedings. (Docket 1164 and 1193) In this appeal, the undersigned seeks to protect **at-risk interests of momentous public importance** and seeks relief that may **promptly and materially** advance the progress or affect the ultimate outcome or **termination** of the underlying Chapter 7 case. Accordingly, a stay of **all proceedings** in Bankruptcy Case No. 22-33553, pending the outcome of the undersigned's appeal in Civil Action No. 4:25-cv-2057, is appropriate under **Fed. R. Bankr. P. 8007(b)**.

A STAY OF PROCEEDINGS PENDING APPEAL IS APPROPRIATE IN THIS CASE

1. **A Stay of All Proceedings in Case No. 22-33553 Will Serve the Interest of Judicial Economy.**

On appeal, Appellant seeks “a **legal finding** that Alex Jones’ obviously and deliberately~ineffective July 2018 Notices of Removal in the Lafferty and Sherlach cases² constitute **operative evidence** of (a) **collusion** or **self-sabotage by the defense** and, thus, of (b) the **fraudulent nature** of the \$1.3 Billion Connecticut state court judgment giving rise to the instant Chapter 7 bankruptcy, **as a matter of law**, because reasonable minds cannot reasonably differ in this regard”. (Docket 1135-2 at 6~7)

² Erica Lafferty, et al. v. Alex Emric Jones, et al., UWY-CV-18-6046436-S; William Sherlach v. Alex Jones, et al., UWY-CV-18-6046437-S; and William Sherlach v. Alex Emric Jones, et al., UWY-CV-18-6046438-S.

If the requested **legal finding** is issued on appeal, then **no other proceedings** in Case No. 22-33553 toward relief are or will **ever** become relevant because, under **Section 523(a)(2)(A)** of the Bankruptcy Code and Bartenwerfer v. Buckley, 598 U.S. 69 (2023), **no relief** may be afforded in bankruptcy based upon or with respect to a collusive/fraudulent judgment. Accordingly, a stay of **all proceedings** in Case No. 22-33553, pending resolution of the appeal in Civil Action No. 4:25-cv-2057, will serve the interest of judicial economy and is, therefore, appropriate under **Fed. R. Bankr. P. 8007(b)**.

2. **A Stay of All Proceedings in Case No. 22-33553 Will Not Cause Undue Delay or Unfair Prejudice.**

A. **A Stay Will Not Cause Undue Delay.**

Merriam-Webster defines “undue” as: “exceeding or violating propriety or fitness: excessive”.³ In Bartenwerfer, *supra*, the Supreme Court of the United States unanimously held that, under **Section 523(a)(2)(A)** of the Bankruptcy Code, **debts incurred by fraud cannot be discharged in bankruptcy**, even if the debtor didn’t personally commit the fraud. If the Connecticut state court judgment is fraudulent (which it is) then, under **Section 523(a)(2)(A)** and Bartenwerfer, **no other proceedings toward relief are or will ever become relevant**, because **no relief** may be afforded in bankruptcy based upon a fraudulent judgment. Accordingly, and based upon the strong likelihood that **all other proceedings** will be rendered **moot** if the plain and operative evidence of fraud/collusion identified by Appellant is reviewed and given **due consideration** on appeal, any **delay** caused by the requested stay will **not** be “undue”.

In his May 28, 2025, **Statement in Connection with Appeal**, the Chapter 7 Trustee states, in pertinent part: “the particular debt about which the Appellant complains—the Connecticut

³ Retrieved from: <https://www.merriam-webster.com/dictionary/undue>

judgment—has already been ruled non-dischargeable by the Bankruptcy Court in adversary proceedings in which the Trustee is not a party. [Adv. Pro. No. 23-03037, Docket No. 76].” (Docket 1156 at 5~6; S.D. Tex. Docket 2 at 5~6) The Chapter 7 trustee appears to imply that the instant appeal is **irrelevant**; but the Chapter 7 Trustee’s assertion flies directly in the face of the Bankruptcy Court’s statement at the June 5, 2025, status conference/hearing that: “This case has been pending since 2022. And folks, it just needs to, it needs to end. **Mr. Jones would be entitled to a discharge at some point**, and parties can argue about what’s dischargeable, non-dischargeable.” (Docket 1193 at 42) [Emphasis added.] Under **Section 523(a)(2)(A)** and Bartenwerfer, supra, **no relief** may be afforded in bankruptcy based upon or with respect to a collusive/fraudulent judgment. This appeal **is** relevant and highly so.

In his **Statement in Connection with Appeal**, the Chapter 7 Trustee further states, in pertinent part: “the Motion to Intervene concerns pre-bankruptcy conduct of the Debtor and the Connecticut Plaintiffs but not the Trustee or his duties to administer the bankruptcy estate of the Debtor.” (Docket 1156 at 4; S.D. Tex. Docket 2 at 4) Probable cause exists to believe that Alex Jones **knowingly** listed **\$965 Million** worth of **fraudulent** Connecticut Sandy Hook “Litigation Claim” debts on his December 2, 2022, **Official Form 104** to his **Voluntary Petition for Individuals Filing for Bankruptcy**. (Docket 1 at 11~18) How does this **not** constitute conduct within the context of the bankruptcy; how does this **not** potentially implicate criminal violations of 18 U.S.C. §§ 152 and 157; and how is it that the Chapter 7 Trustee is **not** fulfilling his “statutory responsibility to identify and refer potential fraud or criminal activity in a case”?⁴

⁴ “**Partners in Combatting Crime: The Vital Roles of Chapter 7 Trustees and The United States Trustee Program**”. U.S. Department of Justice, Archives, U.S. Trustee Program. Retrieved from: <https://www.justice.gov/archives/ust/blog/partners-combatting-crime-vital-roles-chapter-7-trustees-and-united-states-trustee-program>. Cited/quoted at Docket 1120 at 5.

B. A Stay Will Not Cause Unfair Prejudice.

As set forth in **Appellant's Request for Certification**:

The Order herein appealed (Docket 1129) involves a matter of public importance because any validation of the fraudulent \$1.3 Billion Connecticut state court default judgment against Alex Jones, by provision of bankruptcy relief respecting same, will further undermine the **federal judicial system** and will further damage the **1st Amendment**.

(Docket 1144 at 11) [Emphasis as in original.] The low risk of any **unfair** prejudice being caused to any party, by further delay in a bankruptcy proceeding that has already been pending since December 2022, **must be compared with**, and such risk is most assuredly outweighed by, the **public importance** of ensuring **(1)** that justice is properly served in this high-profile and constitutionally-significant case, and **(2)** that further damage is **not** done to the **federal judicial system** and the **1st Amendment** by and through the improper provision of bankruptcy relief for or with respect to a collusive/fraudulent \$1.3 Billion free-speech-chilling default judgment.

As set forth in the undersigned's March 19, 2025, **Motion for Leave to Intervene**, the Debtor and all of the creditors knew or, through the exercise of due diligence (i.e., review of the Lafferty U.S. District Court Remand File, Docket 1120-1), should have known, of the blatantly collusive/fraudulent nature of the \$1.43 Billion (reduced to \$1.3 Billion) Connecticut state court default judgment against Alex Jones. (Docket 1120 at 11) As stated in the undersigned's February 27, 2025, email to the Chapter 7 Trustee:

This is not a complicated case, **Trustee Murray**. **Alex Jones** and his **Randazza** law firm attorney, **Jay Wolman**, a graduate of **Cornell** and **Georgetown Law**, and a 25-year, **AV-Preeminent** rated lawyer, did **not** simply **forget, twice**, in removing the Lafferty and Sherlach cases to federal court in July 2018, **to claim federal question jurisdiction** under **28 U.S.C. Section 1331** to ensure the **U.S. District Court for the District of Connecticut** would have **subject matter jurisdiction** to consider and rule upon the merits of the **1st Amendment**

~based Special [Anti~SLAPP] **Motion to Dismiss** they also filed with the federal court in July 2018. (Please see the attached 13~Slide **PwrPnt for Jones BR Trustee.**)

This was a setup, and **Alex Jones** and his **Randazza** attorneys took an immediate and purposeful dive on the defense of the Connecticut Sandy Hook defamation cases. Based merely upon **Alex Jones'** federal court filings in July 2018 **alone**, there is **more than probable cause** for reasonable minds to conclude that the **\$1.3 Billion Connecticut state court judgment** giving rise to the instant **Chapter 7** bankruptcy of **Alex Jones** **was fraudulently~obtained.**

(Docket 1120-11) [Emphasis and formatting as in original.]

In his May 28, 2025, **Statement in Connection with Appeal**, the Chapter 7 Trustee calls the undersigned's peer~reviewed allegation of fraud (as described above) "highly speculative".

(Docket 1156 at 1; S.D. Tex. Docket 2 at 1) (See, also, Docket 1120-10, **Exhibit 10**: Callender's AJ_SH Endorsement 12.23.24) The question as to **why** Alex Jones threw the defense of the Connecticut defamation cases might still be subject to **some** speculation; but the **fact** that Alex Jones **did, indeed, throw the defense** of the Connecticut defamation actions, and immediately so, by failing to claim federal question jurisdiction for and with respect to **1st Amendment** lawfare cases, is **beyond cavil.**⁵

As noted in the **Procedural History** above, and specifically regarding the issue of **unfair prejudice**, the Bankruptcy Court reasoned as follows:

Whether the granting of a stay would substantially harm the other parties. The answer is no. I think quite frankly it would be harming the trustee's ability to function throughout this case and quite frankly, Mr. Jones' ability to proceed as a Chapter 7 debtor.

(Docket 1193 at 12) The Bankruptcy Court's assessment of the interests at play, and herein competing, strains credulity. The Bankruptcy Court professes concern for the interests of a

⁵ See the Lafferty U.S. District Court Remand File attached as **Exhibit 1** to Appellant's **Motion for Leave to Intervene**. (Docket 1120-1)

demonstrably~culpable colluding debtor over the interests of the public in ensuring the integrity of the **federal judicial system**, and the viability of the **1st Amendment**, in this **high~profile** and **constitutionally~significant** case.

Alex Jones colluded to produce the free~speech~chilling \$1.3 Billion Connecticut state court default judgment. He is entitled to **no relief** in bankruptcy for or with respect to the **collusive Connecticut con**. This is the consequence of collusion. The show **can't** go on. "Fraud vitiates **every thing**." United States v. Throckmorton, 98 U.S. 61, 66 (1878). [Emphasis added.]

Accordingly, parties that knew or should have known of the fraudulent nature of the \$1.43 Billion (now \$1.3 Billion) Connecticut state court default judgment will **not** suffer **unfair** prejudice as a result of a stay, continuance, or suspension of **all proceedings** in the above~captioned Chapter 7 Bankruptcy Case No. 22-33553, pending resolution of Appellant's appeal in Civil Action No. 4:25-cv-2057, which might bring the **true nature** of the default judgment at issue to light and materially advance the ultimate outcome or **termination** of the instant Chapter 7 case.

As a pertinent article from the Civil Resource Manual at Justice.gov states:

Appellate courts may hear interlocutory appeals, in their discretion where "exceptional circumstances warrant," when (1) the order appealed from involves a controlling question of law, (2) as to which there is substantial ground for difference of opinion, (3) an immediate appeal from the order may materially advance the ultimate termination of the litigation. ... [Citations omitted.] ... "To establish that an order contains a controlling question of law, it must be shown that either (1) reversal of the bankruptcy court's order would terminate the action, or (2) determination of the issue on appeal would materially affect the outcome of the litigation." IBI Sec. Serv., 174 B.R. at 670; see In re Capen Wholesale, Inc., 184 B.R. 547 (N.D. Ill. 1995) (controlling issue of law need not be outcome determinative; it need only be an "important one, which could have significantly affected the bankruptcy proceedings below").⁶ [Emphasis as in original.]

⁶ United States Department of Justice, Civil Resource Manual: 96. The "Who, What, When, Where, Why, And How" of Appeals in Bankruptcy Proceedings – Generally, at p. 7 of 11. [<https://www.justice.gov/archives/jm/civil-resource-manual-96-who-what-when-where-why-and->

Appellant respectfully submits that, in this case, the **Order Denying Motion for Leave to Intervene** (Docket 1129) involves a controlling question of law, and that Appellant's appeal from said order may materially advance or affect the ultimate outcome or **termination** of the instant bankruptcy proceeding, because, under **Section 523(a)(2)(A)** and Bartenwerfer, supra, bankruptcy relief is unequivocally **not** available for debts incurred by **fraud** or **collusion**.

3. The Interests of Public Importance for which Appellant Advocates Might be Irreparably Harmed if a Stay of All Proceedings in Case No. 22-33553 is Not Ordered.

The interests being advanced in the instant appeal, namely, **(a)** the integrity of **federal judicial process** and **(b)** the viability of the **1st Amendment**, are at jeopardy of suffering **irreparable harm** if, during the pendency of the instant appeal, **any** form of bankruptcy relief is afforded in respect of a collusive/fraudulent \$1.3 Billion free~speech~chilling default judgment.

As set forth in the **Motion for Leave to Intervene**, the undersigned is **duty~bound**, as a state and federally~licensed attorney, to protect and defend these identified interests of **public importance**. (Docket 1120 at 6 and 11) The undersigned has suffered significant economic loss in pursuing this case without pay. The undersigned's **duty** to pursue this action would not have arisen but for the **collusive** and **treasonous** conduct of Alex Jones and the Connecticut Sandy Hook Families. This constitutes sufficient standing for the undersigned to essentially step into the shoes of a recalcitrant Chapter 7 trustee, who fails or refuses to fulfill his duty to report a credible allegation of fraud, for the specific and limited purpose of presenting plain and operative evidence of fraud/collusion giving rise to the consolidated \$1.3 Billion Connecticut state court default judgment **chiefly at issue** in Case No. 22-33553, i.e., the Connecticut "Litigation Claims" collectively accounting for **99.6%** of the \$969,260,000.00 in unsecured debts Alex Jones listed on

how-appeals-bankruptcy -proceedings] (accessed April 27, 2025).

his December 2, 2022, **Official Form 104** to his **Voluntary Petition**. (Docket 1 at 11~18) With a finding of sufficient standing, Appellant stands a **strong chance/likelihood of success on the merits** in this appeal.

The “**Alex Jones Sandy Hook Case**” (as the consolidated Connecticut defamation actions are known), with its headline~grabbing \$1.43 Billion (now \$1.3 Billion) adverse default judgment against a purported journalist, has developed to become one of the most infamous legal proceedings in the history of our republic, receiving massive media attention both domestically and abroad. The **chilling effects** on free speech and freedom of the press of a \$1.3 Billion adverse default judgment against an alleged journalist are difficult to calculate and impossible to avoid.

According to Google AI, which is aptly referenced for collective public thought/sentiment on matters of public note: “Leading publications have discussed the potential chilling effect of the \$1.4 billion judgment against Alex Jones on freedom of speech and the press. The concern is that this large financial burden could discourage individuals and media outlets from expressing views that might be perceived as controversial or harmful, even if they are protected by the First Amendment.” The **public importance** of the \$1.3 Billion Connecticut state court default judgment, and of an order (i.e., Docket 1129) keeping the **true nature** of said default judgment from being or becoming publicly known and appreciated, is also and well demonstrated by the fact that **even before** the unprecedented verdict and default judgment for \$1.43 Billion was returned and entered in the fall of 2022, William & Mary Law School convened a panel of experts and published an article in the summer of 2022 titled, “**What Does the Alex Jones Case Mean for the First Amendment and Disinformation? Leading Scholars, Lawyers Provide Analysis**”.⁷

⁷ Freeman, George; Lidsky, Lyrisa Barnett; Oberlander, Lynn; and Zick, Timothy, “What Does the Alex Jones Case Mean for the First Amendment and Disinformation? Leading Scholars, Lawyers Provide Analysis” (August 8, 2022). Popular Media. 591.

At Page 12 of the June 5, 2025, status conference/hearing transcript (Docket 1193), the Bankruptcy Court states:

And for whether the granting of the stay would serve the public interest. I don't, have no -- nothing showing the public interest, and I've read all the papers.

The denial of reality does not negate its existence. Or, as **Orwell** aptly noted, "however much you deny the truth, the truth goes on existing, as it were, behind your back".⁸ Regarding its weighing of the competing interests, the Bankruptcy Court further states:

Quite frankly, I think the public interest is better served for a case that's been pending for three years to continue to move and not come to a screeching halt because the party, three years later, seeks to intervene in a case to provide **evidence that the Court has reviewed and other matters.**

(Docket 1193 at 12) [Emphasis added.]

In the same vein, and at Page 11 of the June 5, 2025, status conference/hearing transcript (Docket 1193), the Bankruptcy Court states: "I've read everything that was submitted as well. So it's not like I turned a blind eye to anything that came my way. I read it." These statements by the Bankruptcy Court raise the following questions: Did the Bankruptcy Court deny the undersigned's **Motion for Leave to Intervene** (Docket 1120), and refuse to accept and consider the submitted evidence of fraud, as in accordance with the Bankruptcy Court's April 22, 2025, **Order Denying Motion for Leave to Intervene** (Docket 1129)? Or, did the Bankruptcy Court, despite its April 22, 2025, **Order Denying Motion for Leave to Intervene** (Docket 1129), **nevertheless review and consider** the evidence submitted by the undersigned, particularly the Lafferty U.S. District Court Remand File attached as **Exhibit 1** to the undersigned's **Motion for Leave to Intervene** (Docket 1120-1), and decide that Alex Jones' repeated failure to claim federal question jurisdiction

https://scholarship.law.wm.edu/popular_media/591

⁸ Orwell, George. Facing Unpleasant Facts. Secker & Warburg, 1946.

for **1st Amendment** lawfare cases being removed to federal court most assuredly does **not** indicate or raise suspicion of fraud or collusion? Which is it? The Bankruptcy Court is decidedly vague in this regard.

Alex Jones' filing of a **deliberately~ineffective** Notice of Removal in Lafferty on July 13, 2018, followed promptly by his July 20, 2018, filing of a potentially~dispositive **1st Amendment ~based, Anti~SLAPP Special Motion to Dismiss** (which Jones effectively ensured would not be worth the paper it was written on) (Docket 1120-1 at 11~82 and 151~ 204) was a cynical and sophomoric sleight of hand to abuse and undermine not only **federal judicial process**, but also the **Constitution**, itself, which both establishes the federal judiciary and enumerates our Bill of Rights. Jones colluded with the Connecticut Families to make **a show of a fight** in federal court, wasting the valuable time and limited resources of the Connecticut U.S. District Court, and generating a **false impression** among the public, via Jones' filed, but terminated **Special Motion to Dismiss**, that well~established **1st Amendment** jurisprudence, e.g., N.Y. Times Co. v. Sullivan, 376 U.S. 254 (1964), is no longer valid or has been reversed. (Docket 1120-1 at 151~204 and 385~398)

This **abuse of federal judicial process**, by colluding parties, continues unabated in the instant Chapter 7 bankruptcy proceeding. It is ironic, indeed, that the Bankruptcy Court is concerned with "undue delay" in a proceeding that has been pending, **needlessly** and **unjustly**, since December 2022, particularly because the intervention the undersigned seeks, in order to present plain and operative evidence of fraud/collusion, can promptly bring a **termination** to what is most assuredly **not** a real case or controversy.

At Pages 55~57 and 62 of the June 5, 2025, status conference/hearing transcript (Docket 1193), Alex Jones' counsel states Jones will be appealing the Connecticut judgment to the U.S. Supreme Court and asserting constitutional protections, even though Jones failed to assert same

on appeal. But constitutional protections are not available to Jones because he acted with **actual malice**, admitting in **his own appeal brief**: “Mr. Jones lied about Sandy Hook. He lied to attract attention. That attention drove people to his product pages and sales of those products, presumably, increased.” **Brief of Defendants Alex Jones and Free Speech Systems, LLC** in Lafferty, et al. v. Alex Emric Jones, et al., Connecticut Appellate Court Case No. AC 46131 (filed June 2, 2023), at 47 (highlighted copy without Appendix attached as **Exhibit**).

The issue of fraud or collusion was never raised or litigated in the consolidated Connecticut defamation cases for the simple reason that the parties to said cases (and this Chapter 7 bankruptcy proceeding) were and are acting in collusion. If the instant appeal is **not** allowed, and the plain and operative evidence of fraud or collusion described herein (see Docket 1120-1) is **not** presented and given **due consideration**, then the damage done to the **1st Amendment** by the collusive \$1.3 Billion Connecticut default judgment might not just continue to be difficult to calculate; the damage done might become **incalculable**.

The **News-Times** titled its June 5, 2025, article reporting on the status conference/hearing of even date, “**On Day 916 of Alex Jones’ Sandy Hook bankruptcy, there’s still no end in sight**”.⁹ The **News-Times** got it wrong. There **is** an end in sight. It’s to be found in the Lafferty U.S. District Court Remand File. (Docket 1120-1) It’s called the **truth** and, if simply brought to light and recognized, it will put an end to the Alex Jones/Sandy Hook **abuse of federal judicial process** and **treasonous fraud** being perpetrated against the courts and the American people.

⁹ Retrieved from: https://www.newstimes.com/news/article/alex-jones-sandy-hook-bankruptcy-no-end-day-916-20362576.php?utm_content=hed&sid=67d25a8d609e204adf0fa114&ss=A&st_rid=afcaef60-6230-42a9-858e-18b2874da750&utm_source=newsletter&utm_medium=email&utm_campaign=CT_NT_MorningBriefing, and copy attached as **Exhibit**.

The requested stay of **all proceedings** pending appeal will advance the interests of justice and will protect the very interests of **public importance** the colluding parties to the \$1.3 Billion Connecticut state court default judgment have been **targeting** all along.

REQUEST FOR RELIEF

Interested Party~Appellant hereby moves the **District Court**, pursuant to **Fed. R. Bankr. P. 8007(b)**, for a stay, continuance, or suspension of **all proceedings** in the above~captioned Chapter 7 bankruptcy, Case No. 22-33553, pending resolution of Appellant's appeal in Civil Action No. 4:25-cv-2057.

CONCLUSION

WHEREFORE, for the Foregoing Reasons, Interested Party~Appellant, **Robert Wyn Young**, respectfully submits that **Appellant's Rule 8007(b) Motion for Stay of Proceedings Pending Appeal** is **well~founded**, and it should be **granted**. In addition to other identified exhibits, the undersigned is attaching herewith **(1)** a copy of the Bankruptcy Court's June 5, 2025, **Order Denying Request for Certification of Direct Appeal and Denying Motion to Stay Pending Appeal** (Docket 1164), and **(2)** a proposed Order granting the relief herein requested, as required by **LR7.1(C)**.

Respectfully submitted,

Date: **06/22/25**

/s/ Robert Wyn Young
Robert Wyn Young
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***Pro Se Attorney Intervenor/
Interested Party~Appellant***

LR7.1(D) AVERMENT

Appellant **Robert Wyn Young** hereby avers that, pursuant to **LR7.1(D)**, the undersigned conferred with the respondent by issuing counsel for Debtor~Appellee **Alexander E. Jones** notification, via email sent on June 20, 2025, at 5:37 AM ET, of the undersigned’s intention to file the instant **Rule 8007(b) Motion for Stay**. Counsel for Debtor~Appellee **Alexander E. Jones, Shelby Jordan**, responded to Appellant on June 22, 2025, stating: “Alex E. Jones does not agree with any motion you file other than a Motion to Dismiss appeal.” [See 25_06_22_EW(Debtor’s Counsel) re_LR7 Meet & Confer on Motions to Stay & Supplement Record attached as **Exhibit**.]

/s/ Robert Wyn Young _____
Robert Wyn Young

FED. R. BANKR. P. 8007(b)(4) AVERMENT

Appellant **Robert Wyn Young** hereby avers that, pursuant to **Fed. R. Bankr. P. 8007(b)(4)**, the undersigned gave reasonable notice of the instant **Rule 8007(b) Motion for Stay of Proceedings Pending Appeal** to all parties via Appellant’s June 11, 2025, **Rule 60(B)(4) Motion to Vacate Order Denying Request for Certification of Direct Appeal, Docket 1164** (S.D. Tex. Docket 5), stating, at Pages 3~4: “reasonable and express notice of Appellant’s intention to file a **Fed. R. Bankr. P. 8007(b)** motion for stay of proceedings in and with the District Court being hereby given to all parties in accordance with **Fed. R. Bankr. P. 8007(b)(4)**”.

/s/ Robert Wyn Young _____
Robert Wyn Young

FED. R. BANKR. P. 8015(h) CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing **Appellant’s Rule 8007(b) Motion for Stay** complies with the 5,200~word limitation under **Fed. R. Bankr. P. 8013(f)(3)(A)**, excluding parts exempted under **Fed. R. Bankr. P. 8015(g)** (543 words), and that such certification is based on a **5,197~word** calculation of said **Motion for Stay** by my word processing program.

/s/ Robert Wyn Young _____
Robert Wyn Young

CERTIFICATE OF SERVICE

I hereby certify that on **June 22, 2025**, I caused a copy of the foregoing **Appellant's Rule 8007(b) Motion for Stay**, the **Exhibits** to same, including the attached Bankruptcy Court **Order** denying stay (Docket 1164), and the attached **LR7.1(C) proposed Order** granting motion, to be served on all subscribed parties by the Electronic Case Filing System of the United States District Court for the Southern District of Texas.

/s/ Robert Wyn Young _____
Robert Wyn Young