SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CIVIL DIVISION

MICHAEL E Mann PhD, Plaintiff	Case No. 2012 CA 008263 B
v	Calendar No: 3 Judge: Frederick H Weisberg Next event: None
Mark Steyn, et al, Defendants	

DEFENDANT'S MOTION TO VACATE ORDER OF JULY 19th 2013, AND RESPONSE TO PLAINTIFF'S PRAECIPE RE DEFENDANTS' JOINT REQUEST FOR STATUS CONFERENCE

Defendant Mark Steyn respectfully submits this response to Plaintiff's Praecipe of January 10th 2014 in response to Defendants' Joint Request for Status Conference, and states as follows:

1) On December 19th 2013, the Court of Appeals ordered that the Defendants' appeals are "hereby dismissed as moot because the trial court granted appellee's motion to file his lodged amended complaint and docketed the amended complaint and appellants then filed new special motions to dismiss". By the same logic, Plaintiff's original Complaint must also be moot because the trial court granted his motion to file his Amended

Complaint and docketed his Amended Complaint, and therefore the Court's July 19th 2013 order, issued nine days after accepting the Amended Complaint, must also be moot, as are all subsequent orders relating to the original Complaint. We are thus in the fourth of the four scenarios anticipated on October 9th by this Court (Weisberg, J) in which "the trial court should not have denied the motions to dismiss the first complaint *after* the Plaintiff had filed his amended complaint".

2) Nevertheless, Plaintiff insists that these implicitly moot orders are the law of the case, and that therefore six-sevenths of any Motion to Dismiss the Amended Complaint has already been decided. This is a surreal and desperate argument by Plaintiff, but, given the procedural fiasco to which the case was reduced under the original judge and which those left in her wake have been trying to dig out from under for six months now, it would be imprudent for any Defendant not to take seriously Plaintiff's wish to lower the case into another round of meretricious folderol. Therefore, Defendant Steyn believes it is necessary for a single, clarifying move by the Court that would restore this matter, unambiguously, to the norms of justice, and hack away the many procedural trees obscuring the forest of the case.

3) The three orders required to effect Judge Combs Greene's departure from this case – the original "Order Transferring Case" of August 20th 2013, the "Amended Order Transferring Case" of August 22nd, and the "Second Amended Order Transferring Case" of September 12th (to the best of the Defendant's knowledge there is no "Third Amended Order", but who knows?) – have significant and regrettably confusing differences. But the first two agree (and the third does not dispute) that "all orders previously issued in

this case shall remain in force unless amended or vacated by Judge Weisberg". The Court, therefore, enjoys full authority to bring to bear the "new set of eyes" referenced in its order of October 9th.

4) As filings by both parties and indeed this Court's order of October 9th make clear, this matter has become procedurally byzantine, largely due to the original judge's mismanagement of both the case and her own unnecessarily prolonged departure from it. It has become so overly complicated that the precise meaning of the Appeals Court's order of December 19th was all but incomprehensible even to the legal scholars and practicing attorneys of America's most-read academic-law website, run by UCLA law professor Eugene Volokh. There was no need for this, and it is not a small thing: In almost any other Common Law country, this matter would by now have either been dismissed or gone to trial and reached a verdict. Instead, the Anti-SLAPP phase of the case is now in its second year, thus entirely defeating the purpose of the statute.

5) Plaintiff asserts that the law-of-the-case doctrine "serves judicial efficiency by 'discouraging judge-shopping'". Yet, as he well knows, the only "judge-shopping" in this case has been by the original judge (Combs Greene, J) who, decided on August 20th 2013 to shop the case to another judge "in light of the complexity of the issues" and the "great deal of time and attention" it would require, and which presumably she was disinclined to devote to it. The presumption of the transfer, therefore, is that the new judge has the time and attention to deal with the complexity of the issues that she did not. Thus, the very grounds for her withdrawal are an acknowledgment that the state of the

matter at the point of Judge Combs Greene's departure does not rise to the level of finality understood by law-of-the-case doctrine.

6) Later that same day, August 20th, Counsel for Defendants filed a motion in respect of Judge Combs Greene's order of July 19th. A further motion was filed by Defendants on August 22nd. At that point, an "Amended Order Transferring Case" was issued ordering "that all current motions filed as of this date shall be handled by Judge Combs Greene". In other words, having indicated that she did not have sufficient time and attention to devote to a complex case, even as she was checking out of it, Judge Combs Greene reinserted herself back into it. It is not clear why this was necessary – although, given the principal basis for Defendants' Motion for Reconsideration of her July 19th order, a reasonable person might conclude that she was returning to the case mainly, as the parliamentarians say, on a point of personal privilege[1].

7) At any rate, there followed a period of some weeks in which the original trial court judge and the new judge were both ruling on the same matter. As this Court (Weisberg, J) noted in its order of October 9th, it is "the normal rule that trial and appellate courts should not be acting in the same case at the same time." But it is equally confusing and repugnant to justice to have two trial courts acting in the same case at the same time, as occurred in the period after Judge Combs Greene's whimsical, arbitrary and selective withdrawal. Aside from adding to the already thick procedural miasma, this is not a question of law of the case, but of a two-laws-for-one-case regime, in which a judge, having decided that she

[1] As noted in Paragraph Ten, Defendant Steyn's principal objection to Judge Combs Greene's July 19th order was that she had confused him with Defendant Simberg, not once but throughout the order. One can well understand why she would not want such a basic error to be ruled on by others, but the need to spare herself embarrassment does not in and of itself justify the confusion resulting from her continued half-in, half-out sitting on the case.

did not wish to stick with the matter through coffee and dessert, was reserving the right to nibble at it *à la carte*. Furthermore, because of the need to re-write the transfer orders to accommodate Judge Combs Greene's continuously shifting terms of departure, there are some disturbing inconsistences in them[2].

8) On September 12th, a third attempt was made to clarify the basis on which Judge Combs Greene would exit the case. A Second Amended Order Transferring Case ordered that all pending motions, including the motion to dismiss the amended complaint, would be resolved by the new judge. Nevertheless, the judge again rose zombie-like from the grave eight days later on September 20th to deny Defendants CEI and Simberg's Motion for Reconsideration. Judge Combs Greene, having stuck her left foot in, her left foot out, in, out, in, out, was still shaking it all about one month after supposedly leaving the case. It is entirely risible to seek to impose law-of-the-case finality on a judge who can't even finalize her resignation letter without taking three shots at it. As Plaintiff notes, the law-of-the-case doctrine is designed to prevent "multiple attempts to prevail on a single question"; it is ludicrous to apply it to a case so procedurally botched that the judge requires multiple attempts to prevail on the single question of the terms of her withdrawal.

9) Plaintiff notes that "Judge Combs Greene subsequently denied Defendants' motion to reconsider the July 2013 orders". She did so on August 30th and September 20th

[2] In the amended order of August 22nd, Judge Weisberg is given explicit authority to amend or vacate all orders issued before August 22nd, but no such discretion is specifically given with respect to orders issued by Judge Combs Greene between August 22nd and the date a month later when she finally wrapped up her long goodbye. It would seem reasonable to conclude that it was not the Presiding Judge's intention that the Combs Greene orders pre-August 22nd should be amendable and those post- should be inviolable.

respectively - the former order during the dubious two-laws-of-one-case interregnum, the latter eight days after the Second Amended Order supposedly reserved all outstanding business to the successor judge.

10) Having bailed on the case pleading insufficient "time and attention", Judge Combs Greene also proved her own point by confusing Defendant Steyn with Defendant Simberg throughout her July 19th order, and attributing statements and actions from the latter to the former – including, for example, falsely asserting that Defendant Steyn petitioned the US Environmental Protection Agency to investigate the Plaintiff. It is worth noting that had she exhibited this degree of confusion on the witness stand rather than the judge's bench, she would have had no credibility whatsoever. Yet instead of gracefully acknowledging what was obvious to all – that she had put in insufficient "time and attention" to the case to be able to distinguish Defendant A from Defendant B - Judge Combs Greene dug in and, having departed the case because of the "complexity of the issues", nevertheless issued a drive-by verdict, even as the case was already formally under a new judge. It is improper and, indeed, grotesque for a judge who has chosen to abandon a case at an early stage to presume to state its final outcome, especially when her successor is already in place and has commenced his own rulings. Judge Combs Greene's behavior contrasts very tellingly with the new judge's careful avoidance of "dueling judges" while the appellate court was considering the matter. It is implicit in the Appeals Court's order that, whether or not it was (as Defendant Steyn believes) "clearly erroneous", the July 19th order and all those that followed were improper.

11) Plaintiff asserts that the law-of-the-case doctrine serves "judicial efficiency". Yet the lack of "judicial efficiency" here is entirely due to the mismanagement of her own case by Judge Combs Greene, and her continued mismanagement of it even after it had ceased to be her own case. Defendant Steyn does not live in the District of Columbia and visits it only for the purpose of attending these proceedings. As stated in his original Motion to Dismiss of December 14th 2012, "he denies that this Court may exercise personal jurisdiction over his internet commentary, since that commentary was not purposefully directed at the District of Columbia. *See, e.g., Calder v. Jones*, 465 U.S. 783 (1984). Nor is Mr Steyn subject to general jurisdiction in the District of Columbia." He voluntarily submitted to the Court's jurisdiction "solely to expedite this litigation as a matter of administrative convenience". It is a matter of regret to Defendant Steyn that Judge Combs Greene proved unable to expedite anything. There may well be circumstances in which a judge has to withdraw from a case before its conclusion, but when she does, and on her own timing and for her own convenience, she owes the parties and justice the courtesy of a clean withdrawal that does not damage the rights of those before the Court.

12) Thus it is simply unjust, given the train wreck Judge Combs Greene has made of the case since July 10th, to permit Plaintiff to start over with an amended complaint while denying Defendants the right to mount a full response it. There is no substantive difference between the original and the amended complaint in terms of the actual complaint. Plaintiff's wish to restrict this court merely to a ruling on Count VII of the new complaint adds insult to the many procedural injuries of the last six months. Defendant Steyn believes that the addition of Count VII is simply the pretext for the amended complaint, not the reason for it – which is to get Plaintiff's counsel off the hook for the false

assertion in the original that Defendants were guilty of the "defamation of a Nobel Prize recipient"[3], a claim so outrageous that, in the weeks after filing, it attracted explicit disavowals of Dr Mann's self-conferred Nobel laurels by both the Nobel Institute in Oslo and the Intergovernmental Panel on Climate Change in Geneva (see Exhibits A and B)[4]. Any delay in these proceedings, therefore, is entirely the fault of Counselor Williams' lack of due diligence with respect to his client[5]. One can well understand why Plaintiff would not want his now debunked claim to a place in the Nobel pantheon to remain before this Court, and why he would seek some feeble pretext on which to amend his complaint. But a new Anti-SLAPP hearing entirely confined to Count VII would be a Potemkin hearing staged entirely as a cover for Plaintiff's correction of his resumé inflation. In a process that has already consumed excessive amounts of time and money, it is ridiculous for Counselor Williams to expect this Court to lend itself to staging his transparent charade.

13) Defendant Steyn sympathizes with Plaintiff's concerns over the sclerotic pace of this case, but they are largely due to Plaintiff's own choices in the summer of 2013. He filed his Amended Complaint on June 28th. At that point, he could have asked Judge Combs Greene to withhold ruling on Defendants' Motion to Dismiss the original complaint until

[3] The Amended Complaint is identical to the original Complaint in all but two respects: Count VII, and the "correction" of what Counsel calls "certain terminology regarding" Dr Mann's self-awarded Nobel Prize. Count VII seeks to expand Plaintiff's objection to Defendant Simberg's words "the Jerry Sandusky of climate science", which are already the subject of Count VI as an "intentional infliction of emotional distress". Count VII does not, therefore, add anything new that would impact any eventual verdict or damages.

[4] The many thousands of other IPCC "contributors" did not suffer from the same delusions of Nobel grandeur as Dr Mann. Professor Richard Tol of the University of Sussex in the United Kingdom noted of Plaintiff's original complaint that Mann had "not been entirely truthful in a court case" (see Exhibit C).

[5] It need hardly be stated that a man who falsely inflates his own reputation has an obvious difficulty in demonstrating that such a "reputation" has been damaged. Indeed, the only damage inflicted upon Dr Mann in this matter was entirely self-inflicted by the characteristically brazen braggadocio of the original complaint.

she had decided whether to accept the new one. He did not do so. Nor did he do so after Judge Combs Greene accepted his Amended Complaint on July 10th. Alternatively, after Judge Combs Greene's denial of Defendants' Motion to Dismiss the original complaint, he could have then filed a motion withdrawing his Amended Complaint. After all, as Dr Mann's Internet groupies were happy to crow, he had "won" Round One: Had he not filed the all but indistinguishable Amended Complaint, he would be on his way to trial. The Plaintiff chose to throw speed bumps in his own path – and must now live with the consequences.

14) This brings us back to the eccentric management of the case by Judge Combs Greene. On July 10th, she granted Plaintiff's Motion to Amend and later that day accepted the new complaint. Yet nine days later she chose to rule on the old complaint knowing full well it had been superseded. It would have been easy, in the cause of "judicial efficiency", to decline to rule until Motions to Dismiss the Amended Complaint had been filed. Yet she chose instead to drive the case further and further down the dead-end rat-hole of Motions to Reconsider, Objections to Motions to Reconsider, Denials of Motions to Reconsider, Appeals of Motions to Dismiss and arguments over the appealability of Motions to Dismiss – all over a complaint that, by her own hand, was dead in the water nine days before she decided to rule on it, and whose many barnacles she permitted to encrust to the rusted hulk after she had supposedly "withdrawn" from the case. Defendant Steyn has been in many courtrooms in his native Canada and many other parts of the British Commonwealth and has never seen a case so procedurally bungled. By the logic of both this Court on October 9th and the Appeals Court on December 19th, this multi-car pile-up of orders on a complaint already superseded at the time of ruling must all be moot.

15) Defendant Steyn stands by his words and is willing to defend them at trial and before a jury, should it come to that. However, as a noted human-rights activist in Canada and elsewhere, he believes that the cause of freedom of expression in the United States would best be served by dismissing the amended complaint, and that a trial would have a significant "chilling effect" in America of the kind the Anti-SLAPP laws are specifically designed to prevent. Therefore, given the new complaint before a new judge, he asserts his right to mount a full argument in the cause of dismissal, independent of those advanced by his co-defendants. However, if Plaintiff were to prevail in his insistence that any consideration of the dismissal of his current complaint must be confined to Count VII, Defendant Steyn would see no purpose in playing on such a shrunken, pitiful and discreditable battlefield, and would prefer to move straight to trial. The damage inflicted by Judge Combs Greene's mismanagement both on the Anti-SLAPP process and on the broader cause of free speech would speak for itself.

16) In addition, Defendant Steyn wishes to withdraw from the Defendants' Motion to Dismiss the Amended Complaint filed by his previous counsel. He also wishes to withdraw from his Co-Defendants' Joint Request of December 27th for a Status Conference, which is unnecessary and an undue imposition on a defendant who lives in northern New Hampshire, and about which he was not consulted before it was filed.

17) As the Appeals Court's December 19th order implicitly recognizes, this case was derailed by Judge Combs Greene's perplexing decision on July 19th to rule on a motion to dismiss a complaint already presumptively withdrawn, and all the procedural spaghetti in which it has been ensnared derives therefrom. Given the authority granted to Judge Weisberg by

the Transfer Orders, the swiftest, clearest, cleanest act of jurisprudential hygiene this Court could perform would be explicitly to vacate Judge Combs Greene's order of July 19th, and start afresh on the Amended Complaint with "a new set of eyes".

WHEREFORE Defendant Steyn respectfully requests that this Honourable Court:

a) Vacate Judge Combs Greene's order of July 19th 2013;
b) Grant Defendant Steyn leave to file his own Motion to Dismiss the Amended Complaint;
c) Decline to schedule a Status Conference and instead move directly to a hearing on the Motions to Dismiss; and
d) Grant such other and further relief as may be just and equitable.

Respectfully submitted,

Dated January 21st 2014

By /s/Mark Steyn
Mark Steyn

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January 2014 I caused a copy of the foregoing *Defendant's Motion to Vacate Order of July 19th 2013 and Response to Plaintiff's Praecipe re Defendants' Joint Request for Status Conference* to be served via CaseFileXpress on the following:

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and via First Class mail on the following:

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EXHIBIT

A

NATIONAL REVIEW ONLINE WWW.NATIONALREVIEW.COM PRINT
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Michael Mann's False Nobel Claim

By Charles C. W. Cooke

This morning, I called the Nobel Committee in Norway and asked whether Michael Mann had won a Nobel Peace Prize. The answer was a pretty emphatic "No." Here is the call (apologies for poor quality of the line — transcript provided below):

Cooke: Hello there, do you speak English?
Nobel Committee: Yes, can I help you?
Cooke: I'm a writer. I'm wondering if I could ask you about previous winners of the Nobel Peace Prize?
Nobel Committee: Oh, could you speak a little bit louder. It's difficult for me to hear.
Cooke: Sorry. I'm trying to look for some information about previous winners of the Nobel Peace Prize.
Nobel Committee: Which one?
Cooke: I was wondering, has Dr. Michael Mann ever won the Nobel Peace Prize?
Nobel Committee: No, no. He has never won the Nobel prize.
Cooke: He's never won it?
Nobel Committee: No.
Cooke: Oh, it says on his-

Nobel Committee: The organization won it. It's not a personal prize to people belonging to an organization.

Cooke: Okay. So if I were to write that he'd won it, that would be incorrect?

Nobel Committee: That is incorrect, yes. Is it you that sent me an email today? I got an e-mail from our Stockholm office regarding Michael Mann.

Cooke: Oh. No, I didn't send you an e-mail.

Nobel Committee: Oh. So what's your name?

Cooke: My name is Charles Cooke.

Nobel Committee: And you work for?

Cooke: I write for National Review.

Nobel Committee: Okay, because I've got something from Boston and NY Envirionmental Examiner that asked about the same thing.

Cooke: Oh, okay. Well maybe this is a big question. Okay, but he hasn't won it. That is the answer.

Nobel Committee: No, he has not won it at all.

Cooke: Okay. Perfect. Thank you very much.

Nobel Committee: Thank you. You're welcome. Bye bye.

examiner.com

Professor Mann claims to win Nobel Prize; Nobel Committee says he has not

Screen Cap

Thomas Richard
Boston Environmental Policy
Examiner

October 26, 2012

Professor Michael Mann recently filed a defamation suit against **National Review** Online et al (download legal complaint **here** and **here**) based on articles written by various authors that called into question his famous **hockey stick graph** of global-warming temperatures.

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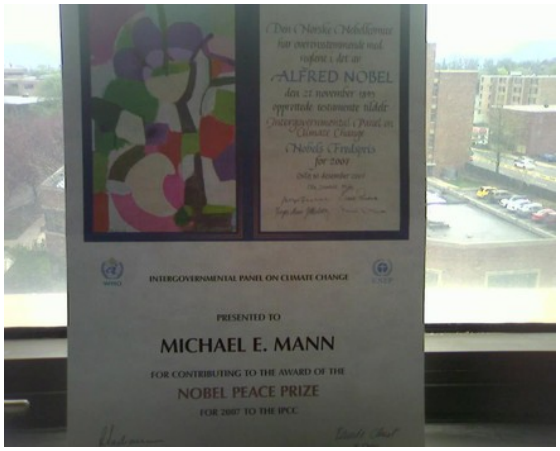

Dr. Michael Mann's website via Watts up with that?

The suit is based on articles written by different authors at different times and can be found **here**, **here**, and **here**.

In the lawsuit, Mann makes the claim that he has been “awarded the Nobel Peace Prize” in the complaint itself (page 2, paragraph 2). He premises much of his argument/suit that by winning such a prestigious prize, he

has the right to sue the aforementioned authors for defamation of character.

I contacted the The Norwegian Nobel Institute to find out if Mann was indeed a Nobel Laureate, winner, etc... My questions were:

1. Was Prof Michael Mann 'awarded' a Nobel Prize of any sort at any time? Is he a Nobel Laureate as implied elsewhere in his legal brief?

2. Did he receive a certificate "for contributing to" the IPCC Nobel Peace Prize? Is the photo of the certificate authentic? [see photo]

3. Is there a difference between stating you "were awarded" the Nobel Peace Prize as indicated by Mann in his legal brief and "contributing to" as shown in the attached photo of the certificate?

Geir Lundestad, Director, Professor, of The Norwegian Nobel Institute emailed me back with the following:

> *1) Michael Mann has never been awarded the Nobel Peace Prize.*
> *2) He did not receive any personal certificate. He has taken the diploma awarded in 2007 to the Intergovernmental Panel on Climate Change (and to Al Gore) and made his own text underneath this authentic-looking diploma.*
> *3) The text underneath the diploma is entirely his own. We issued only the diploma to the IPCC as such. No individuals on the IPCC side received anything in 2007.*

Lundestad goes on to say that, "Unfortunately we often experience that members of organizations that have indeed been awarded the Nobel Peace Prize issue various forms of personal diplomas to indicate that they personally have received the Nobel Peace Prize. They have not."

So it would appear that not only did Mann not get awarded the Nobel Peace Prize, but that the "text underneath the diploma is entirely his own." This calls into further

questions of what else may not be factual in the legal suit over the highly publicized hockey-stick graph and defamation suit.

Michael Mann even **twitted**, "IPCC certificate acknowledging me "contributing to award of the Nobel Peace Prize". Do they want my birth certif too?" It would appear the answer is yes.

For more background on the story, see **here** and **here** and **here**.

Update from Climate Depot: The IPCC issued the certificates with the text on them to IPCC participants, including Mann. Mann did not add the text himself. Here is a photo of a UN IPCC issued certificate (**LINK**)

Suggested by the author

Michael Mann's Jury of his Peers

EXHIBIT

B

2012/12/ST

IPCC STATEMENT

Statement about the 2007 Nobel Peace Prize

The IPCC was awarded the Nobel Peace Prize in 2007 for its work on climate change, together with former US Vice-President Al Gore.

In its citation, the Norwegian Nobel Committee said that the IPCC and Mr Gore shared the prize "for their efforts to build up and disseminate greater knowledge about man-made climate change, and to lay the foundations for the measures that are needed to counteract such change". In its announcement the Norwegian Nobel Committee stated that through the scientific reports it had issued over the past two decades, the IPCC had created an ever-broader informed consensus about the connection between human activities and global warming, and that thousands of scientists and officials from over one hundred countries had collaborated to achieve greater certainty as to the scale of the warming.

The prize was awarded at the end of the year that saw the IPCC bring out its Fourth Assessment Report (AR4).

The prize was awarded to the IPCC as an organization, and not to any individual associated with the IPCC. Thus it is incorrect to refer to any IPCC official, or scientist who worked on IPCC reports, as a Nobel laureate or Nobel Prize winner. It would be correct to describe a scientist who was involved with AR4 or earlier IPCC reports in this way: "X contributed to the reports of the IPCC, which was awarded the Nobel Peace Prize in 2007."

The IPCC leadership agreed to present personalized certificates "for contributing to the award of the Nobel Peace Prize for 2007 to the IPCC" to scientists that had contributed substantially to the preparation of IPCC reports. Such certificates, which feature a copy of the Nobel Peace Prize diploma, were sent to coordinating lead authors, lead authors, review editors, Bureau members, staff of the technical support units and staff of the secretariat from the IPCC's inception in 1988 until the award of the prize in 2007. The IPCC has not sent such certificates to contributing authors, expert reviewers and focal points.

For more information contact:

IPCC Press Office, Email: ipcc-media@wmo.int

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Note to editors

The role of coordinating lead authors, lead authors, review editors, contributing authors, expert reviewers and focal points is described in the IPCC's Principles and Procedures, which can be found on the website www.ipcc.ch . The terms of reference of the Bureau and the functions of the secretariat and technical support units can also be found there.

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EXHIBIT

C

Search

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