

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARK ANDREWS,
Plaintiff,

v.

DINESH D’SOUZA, TRUE THE VOTE,
INC., CATHERINE ENGLEBRECHT,
GREGG PHILLIPS, D’SOUZA MEDIA
LLC, SALEM MEDIA GROUP, INC.,
REGNERY PUBLISHING, INC., and
JOHN DOES,
Defendants.

Case No. 1:22-CV-04259-SDG

**DEFENDANTS SALEM MEDIA GROUP, INC.’S AND REGNERY
PUBLISHING, INC.’S MOTION FOR A MORE DEFINITE STATEMENT**

In the event this Court does not grant their contemporaneously-filed Motion to Dismiss for Failure to State a Claim, Defendants Salem Media Group, Inc. (“Salem”) and Regnery Publishing, Inc. (“Regnery”) ¹ respectfully move this Court,

¹ Plaintiff incorrectly named “Regnery Publishing, Inc.” as a defendant in his First Amended Complaint (“FAC”). Regnery Publishing, Inc. is not affiliated with Salem or the subject matter of the FAC. Assuming Plaintiff intended to assert claims against Salem Communications Holding Corporation d/b/a Regnery Publishing, which is the entity that published the book titled “2000 Mules,” but without waiving any defenses related thereto, this Motion seeks a more definite statement of the claims and allegations that Plaintiff asserted against “Regnery Publishing, Inc.” and that Plaintiff intended to assert against Salem Communications Holding Corporation d/b/a Regnery Publishing.

pursuant to Rule 12(e) of the Federal Rules of Civil Procedure, for an order compelling Plaintiff Mark Andrews (“Plaintiff”) to replead his First Amended Complaint with a more definite statement as to his claims and allegations against Salem and Regnery, so that they may reasonably and fully respond.

As currently pled, Salem and Regnery cannot reasonably formulate a response to the First Amended Complaint, except to show that dismissal of the First Amended Complaint as to them is proper. Accordingly, and for the reasons set forth more fully in the accompanying Brief in Support of this Motion, Salem and Regnery respectfully request that if the Court does not grant their Motion to Dismiss filed concurrently herewith, the Court order Plaintiff to replead his claims to provide a more definite statement of the specific allegations and claims that are directed toward Salem and Regnery.

Respectfully submitted this 13th day of January, 2023.

/s/ S. Derek Bauer

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RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with Times New Roman 14-point font in accordance with Local Rule 5.1(C).

Dated: January 13, 2023

/s/ S. Derek Bauer
S. DEREK BAUER
Georgia Bar No. 042537

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within and foregoing **DEFENDANTS SALEM MEDIA GROUP INC.'S AND REGNERY PUBLISHING, INC.'S MOTION FOR A MORE DEFINITE STATEMENT** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record:

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This 13th day of January, 2023.

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