

GREGORY C. BELMONT
% CereBel Legal Intelligence
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New York, NY [REDACTED]
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IN THE FOURTH JUDICIAL DISTRICT COURT
UTAH COUNTY, STATE OF UTAH

BAM FRANCHISING, INC., a Delaware corporation; AMMON MCNEFF, an individual; MATTHEW MCNEFF, an individual; JOSH JOHNSON, an individual; BRANDON BEST, an individual; BAKER BRICKS, LLC, a Utah limited liability company, and dba SALEM-BAKER BRICKS INC., an Oregon corporation,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER, an individual, dba and aka “RECKLESS BEN”; RECKLESS BEN LLC, a California limited liability company; BRYAN MANSELL, an individual; VICTOR NGUYEN, an individual; and DOES 1–15,

Defendants.

**REPLY TO PROVISIONAL
MEMORANDUM IN OPPOSITION TO
MOTION TO EXPEDITE
CONSIDERATION OF PROPOSED
INTERVENOR’S MOTION TO
INTERVENE FOR LIMITED PURPOSE
AND TO PARTIALLY VACATE
TEMPORARY RESTRAINING ORDER**

Case No.: 260402353

Judge Tony F. Graf, Jr.

Proposed Intervenor Gregory C. Belmont respectfully submits this reply in support of his Motion to Expedite Consideration of his Motion to Intervene for Limited Purpose and to Partially Vacate Temporary Restraining Order.

Plaintiffs’ opposition confirms, rather than defeats, the need for prompt procedural direction. Plaintiffs have now appeared, objected, and previewed their position. The only issue presently before the Court is not whether Proposed Intervenor will ultimately prevail on intervention or Rule 65A relief, but whether the Court should set a shortened schedule that

permits those issues to be decided before the existing TRO continues to suppress speech and access to speech through the June 30 preliminary-injunction hearing.

Since Proposed Intervenor filed his Motion to Intervene and Partially Vacate TRO and Motion to Expedite, other proposed intervenors—Chrystal Law, Benjamin Gorman, and BAMF Salem 1, LLC (the “Law-Gorman Proposed Intervenor”)—have filed related motions seeking limited intervention and Rule 65A(b)(4) modification or dissolution of the same TRO [Docs. 61 & 63]. Proposed Intervenor does not presume to appear as a party, does not purport to speak for the Law-Gorman Proposed Intervenor, and does not ask the Court to decide their motions through this reply. He respectfully notes, however, that those filings raise overlapping Rule 24, Rule 65A, due-process, and First Amendment objections to the same speech-restrictive TRO provisions. Their pendency reinforces the need for prompt procedural direction and coordinated consideration before the TRO is converted into, or effectively operates as, a continuing speech restraint.

Plaintiffs’ principal objections rest on three errors. First, Plaintiffs treat the Motion to Expedite as if it asks the Court to decide the underlying intervention and TRO-modification motion without any opportunity to respond. It does not. It asks the Court to shorten the schedule because the challenged order restrains First Amendment activity now. Second, Plaintiffs treat Proposed Intervenor’s nonparty status as a reason no expedited Rule 65A-related review can occur. That reverses the structure of the motion: Proposed Intervenor seeks expedited Rule 24 consideration precisely so that his Rule 65A objections to the speech-restrictive TRO provisions can be heard. Third, Plaintiffs minimize the restrained speech as merely “a post or two.” But the Supreme Court has held that “[t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373–74 (1976).

I. THE REQUESTED RELIEF IS A CASE-MANAGEMENT REQUEST FOR EXPEDITED CONSIDERATION, NOT AN ATTEMPT TO DENY PLAINTIFFS A MEANINGFUL RESPONSE.

Plaintiffs repeatedly characterize the requested schedule as unfair because it would require an opposition within 24 hours. That framing omits the context. Proposed Intervenor served the underlying Motion to Intervene and Partially Vacate TRO on Plaintiffs on June 11, 2026. The proposed 24-hour period began only after Plaintiffs had already received more than the 48 hours' notice contemplated by Rule 65A(b)(4) for motions to dissolve or modify a temporary restraining order issued without notice.

In any event, Proposed Intervenor does not ask the Court to adopt any particular schedule at the expense of fairness. The requested relief is that the Court prescribe a schedule short enough to permit meaningful review before the June 30 preliminary-injunction hearing. If the Court concludes that Plaintiffs should receive more than 24 hours for their full opposition, Proposed Intervenor respectfully requests that the Court set the shortest fair schedule consistent with the First Amendment interests at issue, rather than defaulting to ordinary briefing that would allow the challenged restraint to operate beyond the temporary period contemplated by Rule 65A before meaningful review of its speech-restrictive provisions. Utah R. Civ. P. 65A(b)(2), (b)(4).

Plaintiffs obtained the challenged TRO on an ex parte basis one day after filing their Complaint and TRO motion. That procedural history does not deprive Plaintiffs of a fair opportunity to respond here, but it does undercut the suggestion that expedited review of the TRO's speech-restrictive provisions is inherently unreasonable.

Plaintiffs have also now filed a provisional opposition addressing the asserted procedural defects in the Motion to Expedite. The Court therefore need not deny expedition on the premise that Plaintiffs have had no opportunity to be heard. The Court can set a fair, expedited schedule

on the underlying motion now.

II. PLAINTIFFS' CLAIMED LACK OF NOTICE DOES NOT SUPPORT DENYING EXPEDITED CONSIDERATION.

Plaintiffs' claimed lack of notice is difficult to reconcile with the service record, strains candor, and should not defeat a narrowly tailored expedited schedule. Plaintiffs' June 15 email to chambers stated that Belmont's courtesy-copy email was "the first we have heard that anything of the sort was being filed with Court." After that statement, Proposed Intervenor promptly provided chambers and Plaintiffs' counsel with the underlying service emails, identified the June 11 and June 15 service history, and explained the follow-up telephone calls made to counsel's firm to ensure actual notice. Ex. A. Proposed Intervenor also separately provided Plaintiffs' counsel with phone-log documentation before Plaintiffs filed their opposition. Ex. B. Plaintiffs nevertheless continued to rely on lack-of-notice and unfair-surprise themes in opposing expedition, while characterizing Proposed Intervenor's filing as merely "purported" and casting aspersions on his motives. Pls.' Provisional Mem. Opp'n Mot. to Expedite 2, 4 (not yet docketed).

The service history matters because Plaintiffs' opposition repeatedly frames the requested schedule as if Plaintiffs received no meaningful notice before the proposed opposition period. In fact, Plaintiffs had been served with the underlying motion several days earlier, the proposed 24-hour period would have run only after the 48-hour notice period referenced in Rule 65A(b)(4) had already elapsed, and Proposed Intervenor made repeated efforts to ensure actual notice despite docketing delays affecting his pro se email filings.

That context matters because pro se filers do not have access to the direct-to-docket attorney e-filing system available to represented parties. Instead, to file digitally they must submit papers through an email filing channel that treats documents as filed when received but

anticipates a 48 hour administrative delay before the papers appear on the public docket; here, Proposed Intervenor’s papers filed by email have inexplicably not appeared on the public docket more than five and three business days after email filing.

III. Plaintiffs Overstate the Burden of Responding to the Underlying Motion.

Plaintiffs repeatedly characterize the underlying motion as “overlength” and a “28-page overlength filing.” Opp’n 2, 4. Plaintiffs’ “overlength” objection is mistaken. Although Plaintiffs emphasize page count, Rule 7(q) permits a Rule 65A motion to comply with the 9,000-word limit even if it does not fit within the corresponding page limit. Utah R. Civ. P. 7(q)(1). Proposed Intervenor’s Motion to Intervene and Partially Vacate TRO seeks Rule 65A relief from the TRO’s speech-restrictive provisions and contains approximately 7,780 words, excluding non-counted matter under Rule 7(q)(2). It is therefore within the applicable word limit, and no motion for leave to file an overlength brief was required.

To avoid any possible uncertainty created by Plaintiffs’ overlength objection, Proposed Intervenor includes Rule 7(q) certifications for both this Reply and the underlying Motion to Intervene and Partially Vacate TRO after the signature block below.

IV. Plaintiffs’ Collateral Aspersions Do Not Justify Denying Reasonable Procedural Indulgence to an Orderly Pro Se Litigant

The mistaken overlength accusation is not material to the expedited-schedule question, but it is consistent with Plaintiffs’ broader effort to prejudice the Court against a pro se proposed intervenor through collateral characterizations rather than address the narrow scheduling issue. Plaintiffs’ opposition repeatedly describes Proposed Intervenor’s filings as “purported,” “overlength,” “absurd,” and a “public relations stunt,” while also reserving a threat to seek attorney fees against a nonparty listener seeking limited First Amendment review. Those aspersions do not establish prejudice, do not defeat the service record, and do not justify denying

a narrowly tailored expedited schedule.

Utah courts hold self-represented parties to the same general standard as members of the bar, but also recognize that a pro se litigant “should be accorded every consideration that may reasonably be indulged.” *State v. Winfield*, 2006 UT 4, ¶ 19, 128 P.3d 1171; *Lundahl v. Quinn*, 2003 UT 11, ¶ 3, 67 P.3d 1000. That leniency is especially appropriate for litigants who are “largely strangers to the legal system,” whom courts are “loath to sanction ... for a procedural misstep here or there,” as distinct from serial litigants whose routine and abusive use of the courts makes special leniency inappropriate. *Lundahl*, 2003 UT 11, ¶¶ 4–5. Proposed Intervenor seeks only reasonable procedural accommodation, if any is required, for inter alia public docketing delays beyond his control, good-faith effort to clarify compliance through Rule 7(q) certifications rather than seek exemption from the rules, and recognition of Rule 10(f)’s acceptance-and-correction framework for papers presented for filing, so that any perceived procedural irregularity may be addressed without preventing consideration of his substantial First Amendment and Rule 65A claims on their merits.

V. RULE 7, RULE 24, AND RULE 65A SUPPORT EXPEDITED PROCEDURAL TREATMENT WHEN A NONPARTY SEEKS LIMITED INTERVENTION TO CHALLENGE A SPEECH-RESTRICTIVE TRO.

Plaintiffs’ Rule 7 objection is that Rule 7(l) does not expressly list a “motion to expedite” or “motion to shorten briefing” among the motions that may be acted on without awaiting a response. Pls.’ Opp’n 5–7. Plaintiffs separately argue that Rule 65A(b)(4) is unavailable because Proposed Intervenor is not yet a party or “adverse party.” *Id.* at 6–7. Those objections conflate the procedural request now before the Court with the substantive relief requested in the underlying motion.

The Motion to Expedite does not ask Rule 7 to supply the substantive basis for intervention or TRO modification, and it does not ask the Court to treat Proposed Intervenor as a

party before intervention is granted. It invokes Rule 7(l) and Rule 7(j) as procedural mechanisms for presenting a time-sensitive case-management request, submitting it promptly, and providing a proposed scheduling order. The substantive bases for the requested relief remain Rule 24, Rule 65A, and the First Amendment interests implicated by the TRO.

Nor does Rule 24's silence on briefing schedules mean that a motion to intervene can never be expedited. Plaintiffs themselves acknowledge that a motion to intervene proceeds under ordinary timelines "unless the Court exercises its discretion to modify them." Pls.' Opp'n 6. That is exactly what Proposed Intervenor requests. The issue is whether the Court should exercise that discretion where the proposed intervention is narrow, no discovery or general merits participation is sought, and the challenged TRO provisions restrict access to speech now.

Rule 65A(b)(4) further supports expedition. Plaintiffs argue that only an "adverse party" may invoke that subdivision and that Proposed Intervenor is not yet a party. But Proposed Intervenor's motion is structured to address that point: he first seeks limited intervention under Rule 24 and then seeks Rule 65A relief from the speech-restrictive provisions of the TRO. A proposed intervenor must be able to request timely consideration of intervention itself; otherwise, time-sensitive intervention rights could be lost before the Court ever reaches them.

Plaintiffs' reading would mean that a nonparty whose independent First Amendment recipient interests are impaired by an ex parte speech restraint could never obtain timely review unless an existing defendant independently raised the same recipient-right issues. Rule 24 exists to avoid that result where a nonparty has a legally protected interest that may be impaired and is not adequately represented.

The related Law-Gorman filings [Docs. 61 & 63] confirm that Proposed Intervenor's procedural request is not an idiosyncratic attempt to bypass ordinary practice. Those represented proposed intervenors likewise proceed under Rule 24 for limited intervention and under Rule

65A(b)(4) to modify or dissolve the same ex parte TRO. They identify overlapping Rule 65A defects, including the order’s definition of restrained speech by reference to the Verified Complaint, its asserted reach toward nonparties through “acting in concert” and similar language, its mandatory takedown character, its temporal problem under Rule 65A(b)(2), and its breadth as a prior restraint. Proposed Intervenor conditionally joins only the overlapping relief to the extent consistent with his own pending motion: expedited consideration, modification or dissolution of the speech-restrictive portions of Paragraphs 5(j) and 5(k), and clarification that independent nonparties are not bound absent actual active concert within Rule 65A.

VI. PLAINTIFFS’ ATTACKS ON PROPOSED INTERVENOR’S LISTENER INTEREST GO TO THE UNDERLYING MOTION AND DO NOT JUSTIFY DENYING EXPEDITED CONSIDERATION.

Plaintiffs characterize Proposed Intervenor as merely a “single consumer” or “passive subscriber” and argue that recognizing his interest would allow every viewer to intervene. That argument goes to the merits of the underlying Rule 24 motion, not whether the Court should decide the motion promptly. It also mischaracterizes the asserted interest.

Proposed Intervenor is not seeking general participation in this litigation, discovery, control over any party’s defense, or intervention in all issues. He seeks limited intervention to address a TRO that restricts speech he paid to receive as a YouTube and Patreon subscriber and that affects his First Amendment interest as a recipient of speech from willing speakers. The Supreme Court has recognized that First Amendment protection extends not only to speakers but also to recipients. *Virginia State Bd. of Pharmacy v. Virginia Citizens Consumer Council, Inc.*, 425 U.S. 748, 756–57 (1976); *Stanley v. Georgia*, 394 U.S. 557, 564 (1969); *Lamont v. Postmaster Gen.*, 381 U.S. 301 (1965).

The possibility that other viewers or subscribers may also be affected is not a reason to deny all expedited review. Courts retain ordinary case-management authority to prevent

duplicative or burdensome intervention. Proposed Intervenor’s limited request does not open the door to unlimited merits participation by the public. It asks only that one affected recipient be heard on the legality, scope, and continuation of speech-restrictive TRO provisions before those restrictions remain in force through the preliminary-injunction hearing. That listener/subscriber interest is distinct from, but complementary to, the Law-Gorman Proposed Intervenors’ asserted interest as identified nonparties whose own dispute is incorporated into the TRO’s takedown language.

VII. FIRST AMENDMENT RESTRAINTS CREATE URGENCY EVEN WHEN THE RESTRAINT IS TEMPORARY.

Plaintiffs assert that there is no emergency because the matter involves a YouTuber who may “miss a post or two.” That understates the injury and the legal issue. The TRO does not merely affect posting convenience. It restrains publication and access to publication concerning matters of public controversy, business conduct, consumer trust, and the conduct of Plaintiffs and Defendants. It also affects the ability of recipients, including Proposed Intervenor, to receive speech from willing speakers.

The Supreme Court’s First Amendment cases reject the idea that temporary speech restraints are harmless merely because they are short. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod*, 427 U.S. at 373–74. See also *Organization for a Better Austin v. Keefe*, 402 U.S. 415, 419–20 (1971). That principle is directly relevant to whether ordinary briefing is adequate here. If the Court waits for the ordinary Rule 7 schedule, the challenged restraint will remain in effect until, or effectively through, the already-scheduled preliminary-injunction hearing. That result would deprive Proposed Intervenor’s Rule 24 and Rule 65A request of practical effect.

VIII. PLAINTIFFS’ “PUBLIC RELATIONS” ACCUSATIONS ARE IRRELEVANT TO THE PROCEDURAL QUESTION BEFORE THE COURT.

Plaintiffs’ admittedly “presumed” speculation that Proposed Intervenor filed this motion to publicize a legal technology project, Opp’n 3 n.1, is unsupported and irrelevant to the request for expedited consideration. The filings were made by Gregory C. Belmont individually and pro se. No other party or entity is a filer, proposed intervenor, party, or asserted beneficiary of the requested relief. The appearance of CereBel Legal Intelligence is limited to a related email domain and mailing-address line.¹

Plaintiffs identify no statute, rule, contract, order, or other basis entitling them to attorney fees from a nonparty proposed intervenor who seeks limited Rule 24 intervention and Rule 65A review of speech-restrictive TRO provisions. Their gratuitous reservation of a right to seek fees is therefore not a merits response to the Motion to Expedite; whatever Plaintiffs’ subjective purpose, its practical effect is to warn a nonparty listener-subscriber that seeking limited First Amendment review may carry financial consequences. In the context of a motion challenging speech-restrictive relief, such rhetoric risks discouraging participation by affected nonparties and speech recipients who seek only an opportunity to be heard on the legality and scope of the restraint.

That concern is heightened by Plaintiffs’ attempt to recast a narrow procedural motion as frivolous, “absurd,” and a “public relations stunt,” while at the same time devoting substantial briefing to opposing it on procedural and substantive grounds. Explicitly reserving fees adds no

¹ For required paper-filing address purposes, Proposed Intervenor uses an office mailing address where his personal mail is received by a USPS-registered commercial mail receiving agent with whom he is registered through a project name; the project/entity c/o address line assists with reliable routing and delivery. Any connection between Proposed Intervenor’s intervention and his software-development activities, about which he has written publicly, is limited to longstanding access-to-justice, civil-rights, First Amendment, and legal-journalism interests that predate this dispute and include prior amicus participation. The intervention is brought individually and pro se, and the requested relief would benefit Proposed Intervenor’s asserted recipient interest, not any for-profit business entity.

substantive answer to the Motion to Expedite. The reservation is therefore more consistent with an effort to deter participation than with confidence that the motion can be readily disposed of on its merits.

Proposed Intervenor notes that video journalism underlying much of Plaintiffs' Verified Complaint documents allegations that Plaintiffs or their agents have responded to criticism, inquiry, or participation by invoking the prospect of arrest, litigation expense, or other legal consequences against critics and participants, including Defendants Schneider and Mansell and the Law-Gorman Proposed Intervenors.^{2,3,4,5} Proposed Intervenor cites those allegations not for the truth of the underlying allegations, but as contextual support for why a reasonable observer could view Plaintiffs' fee reservation, disparaging speculation concerning Proposed Intervenor's motives, and unsupported attacks on his good faith as part of a broader pattern of attempting to increase the costs of participation in matters touching on Plaintiffs' public conduct. That context is relevant to the limited issue now before the Court because Plaintiffs' motive-based accusations should not be credited as a reason to deny an orderly, expedited schedule for consideration of substantial First Amendment and Rule 65A objections.

² As to Defendant Benjamin Paul Schneider, video journalism cited in Complaint *alleges* one or more Plaintiffs incited a Utah police department to arrest, home raid, and criminally charge in response to attempting service of court process. See <https://youtu.be/Hs3bElrHKUE>

³ As to Defendant Bryan Mansell, video journalism cited in Complaint *alleges* a Plaintiff warned that if the dispute went to court, "we're going to drag this thing out so long," and Mansell would spend more than the disputed collection was worth. See <https://youtu.be/wscOpkewgNU> at 4:25.

⁴ As to proposed intervenors Law-Gorman, video journalism described in Complaint depicts the director of operations for Plaintiff BAM Franchising, Inc. *alleged* voice warning that "the legal route" would be "a very expensive battle" and "expensive for you" and "If you fight this, then you're putting yourself into a whole lot of shit. It sounds like a threat and I can acknowledge that, because in a way it is." See <https://youtu.be/zedmOopRTm0> at 2:04.

⁵ As reported to unnamed YouTubers, "Mansell then reached out to YouTubers, some of whom detailed how Bricks & Minifigs appeared to have effectively stolen all these lego sets. But then (according to one of the YouTubers) Bricks & Minifigs threatened to sue them (sense a pattern?) and they took down the videos." See <https://www.techdirt.com/2026/06/02/everyone-in-this-lego-dispute-should-have-spoken-to-a-lawyer-earlier-than-they-did/>

IX. REQUESTED RELIEF

For these reasons, Proposed Intervenor respectfully requests that the Court grant the Motion to Expedite and set an expedited schedule for resolution of the Motion to Intervene for Limited Purpose and to Partially Vacate Temporary Restraining Order.

Specifically, Proposed Intervenor requests that the Court:

1. Order Plaintiffs to file any full opposition to the underlying Motion to Intervene and Partially Vacate TRO by _____, with Proposed Intervenor's reply due by _____, and then submit the motion for decision on the papers;
2. Should the Court determine that hearing from the parties would assist resolution, set the matter for the earliest available hearing before the June 30 preliminary-injunction hearing, with any supplemental briefing schedule the Court deems appropriate; or in the alternative
3. Hear and decide Proposed Intervenor's Motion to Intervene for Limited Purpose and Partially Vacate TRO at the June 30 preliminary-injunction hearing or in conjunction with that hearing.

If the Court sets any hearing on the Motion to Intervene and Partially Vacate TRO, Proposed Intervenor respectfully requests leave to appear remotely by video under Utah Rule of Civil Procedure 87, in light of his out-of-state residence, pro se status, limited requested participation, lack of financial stake in the requested relief, and the procedural and legal nature of the issues to be heard.

At minimum, Proposed Intervenor requests that the Court set a schedule that permits the Rule 24 and Rule 65A issues concerning the TRO's speech-restrictive provisions to be decided before, at, or in conjunction with the June 30 preliminary-injunction hearing.

Proposed Intervenor also preserves his alternative request that, if the Court concludes formal intervention is unnecessary, the Court may treat the underlying motion as a nonparty submission identifying facial First Amendment defects and Rule 65A concerns, vacate or clarify the TRO's speech-restrictive provisions sua sponte, or enter such further procedure as the Court deems proper.

DATED this 19th day of June, 2026.

Respectfully submitted,

/s/ Gregory C. Belmont
Gregory C. Belmont
Proposed Intervenor, Pro Se

CERTIFICATION UNDER UTAH R. CIV. P. 7(q)

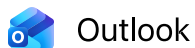
I certify that this Reply complies with the applicable word limit under Utah Rule of Civil Procedure 7(q). Excluding the caption, signature block, certification, certificate of service, exhibits, attachments, and other material excluded by Rule 7(q)(2), this Reply contains approximately 3,380 words and is therefore within the 3,590-word limit applicable to a reply memorandum supporting motions other than those governed by Rules 12(b), 12(c), 56, or 65A.

I further certify, protectively and in response to Plaintiffs' overlength objection, that the underlying Motion to Intervene for Limited Purpose and to Partially Vacate Temporary Restraining Order complies with Utah Rule of Civil Procedure 7(q). The underlying motion seeks limited intervention under Rule 24 for the purpose of obtaining Rule 65A relief from the TRO's speech-restrictive provisions. To the extent the underlying motion exceeds the corresponding page limit, Proposed Intervenor relies on Rule 7(q)'s word limit for motions seeking relief authorized by Rule 65A. Excluding the caption, signature block, certification, certificate of service, exhibits, attachments, and other material excluded by Rule 7(q)(2), the underlying motion contains approximately 8,100 words and is within the 9,000-word limit applicable to motions seeking relief authorized by Rule 65A.

DATED this 19th day of June, 2026.

/s/ Gregory C. Belmont
Gregory C. Belmont
Proposed Intervenor, Pro Se

EXHIBIT A: Email Thread to Judge Graf Team



Outlook

Re: BAM Franchising, Inc. v. Schneider, Case No. 260402353

From Gregory C. Belmont (CereBel) [REDACTED]**Date** Tue 6/16/2026 12:39 AM**To** [REDACTED] <[REDACTED]@[REDACTED].gov>**Cc** [REDACTED];

3 attachments (513 KB)

DentonEmail061126-1.pdf; DentonEmail061526-1.pdf; DentonsEmail061526-2.pdf;

Judge Graf's Chambers, Counsel, and Parties:

I write to clarify the service history so the record is not misunderstood.

Proposed Intervenor served Plaintiffs' counsel with the Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order and Certificate Of Service by email on June 11, 2026, at approximately 7:53 a.m. New York time. Proposed Intervenor then promptly submitted those papers to the Court's pro se filing email address ("Provo Filing"), from which an automatic response was received. Those papers have not yet appeared on the docket, which is why copies were provided to chambers today, with all parties copied.

Proposed Intervenor also served today's Motion To Expedite Consideration, Request To Submit, and proposed orders on Plaintiffs' counsel and all parties by email at approximately 6:44 a.m. New York time, and promptly submitted the same by email to Provo Filing.

Those service emails were also followed by telephone calls to the Dentons law firm receptionist who agreed to notify the named attorneys and request acknowledgment of receipt on behalf of Proposed Intervenor. Copies of both service emails to Mr. Rich and his colleagues are attached (note stated times are EST) and are consistent with the two submitted Certificates of Service.

To the extent Plaintiffs object to expedited consideration or to the procedural basis for the motion, Proposed Intervenor will address those issues by filing rather than by argumentative email to chambers. Proposed Intervenor notes only that the Motion to Expedite Consideration invokes Rule 65A(b)(4), which provides for a motion to dissolve or modify a temporary restraining order issued without notice on 48 hours' notice to the party who obtained it. Plaintiffs' reference to a proposed 24-hour opposition period should be understood in context: that period would at this point begin after the 48 hours provided by Rule 65A(b)(4) has already elapsed, because the underlying Motion to Intervene and Partially Modify TRO was served on Plaintiffs on June 11, 2026.

(I also note to address any possible confusion that all service and submissions were made by me, Gregory C. Belmont, individually. D/b/a CereBel Legal Intelligence is not a filer or proposed intervenor in this matter; it appears only in my email domain and mailing address line.)

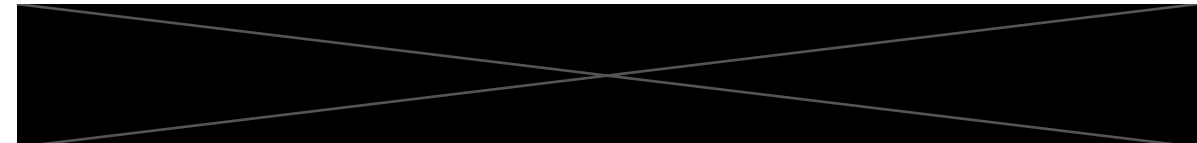
Respectfully,

Page 2/4

Gregory C. Belmont
Proposed Intervenor, Pro Se



From: Rich, Justin
Sent: Monday, June 5, :



s.com>;

Subject: RE: BAM Franchising, Inc. v. Schneider, Case No. 260402353

Judge Graf's Team,

We received the below email this afternoon, which is the first we have heard that anything of the sort was being filed with Court. CereBel Legal Intelligence and/or Mr. Belmont's various "filings" have still not appeared on the docket in this case. Though we note the Motion for Expedited Consideration is not specifically listed in Utah's Rules of Civil Procedure as one that can be decided without waiting for a response, we hereby object such and intend to provide a supporting memorandum by end of day Thursday, 6/18/26.

We also note that the proposed briefing schedule included in the Motion for Expedited Consideration, which would require an opposition to the Motion to Intervene to be completed and filed within just 24 hours is impractical, unreasonable, and unsupported by the Utah Rules of Civil Procedure. Though this will be detailed further in Plaintiffs' intended objection to the Motion for Expedited Consideration and supporting memorandum, in light of Mr. Belmont's proposed order and request to submit, we believe it is appropriate to advise the Court of our objection and intended opposition to the Motion for Expedited Consideration immediately to avoid any premature adjudication of these motions. The apparently pro se motion is not ripe for consideration.

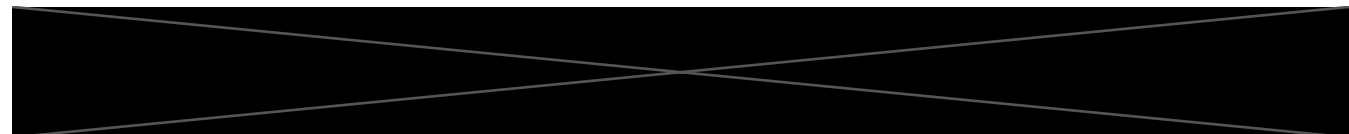
We appreciate your attention to this important matter.

Justin Rich
Associate Attorney



Dentons Durham Jones Pinegar P.C. | [Lehi](#)

From: Gregory C. Belmont (CereBel)
Sent: Monday, June 15, 2026 3:06 PM



Subject: BAM Franchising, Inc. v. Schneider, Case No. 260402353

[WARNING: EXTERNAL SENDER]

Dear Judge Graf's Chambers:

I am Proposed Intervenor Gregory C. Belmont, appearing pro se, in BAM Franchising, Inc. v. Schneider, Case No. 260402353.

I write to provide courtesy copies of documents filed by email today and June 11th. The papers were emailed to the Court's email address for [REDACTED] (pro se filers are excluded from use of more direct e-filing platform). [REDACTED] 11th papers, filed almost 3 complete business days ago have not yet been docketed, the docketing of today's filings will likely also be delayed, and because an attached motion requests expedited consideration pursuant to Rule 7(l) of a pending Rules 65A(b)(4) motion concerning a Temporary Restraining Order, I am also providing courtesy copies to chambers so the Court is aware of the request.

Attached are:

1. Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order, emailed for filing on June 11, 2026;
2. Certificate Of Service for the Motion To Intervene, emailed for filing on June 11, 2026;
3. Motion To Expedite Consideration Of Proposed Intervenor's Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order;
4. Request To Submit For Decision Motion To Expedite Consideration Of Proposed Intervenor's Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order;
5. [Proposed] Order Granting Motion To Expedite Consideration Of Proposed Intervenor's Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order (as PDF and RTF); and
6. [Proposed] Order Granting Proposed Intervenor's Motion To Intervene For Limited Purpose And To Partially Vacate Temporary Restraining Order (as PDF and RTF).
7. Certificates of Service for documents 3-7.

The proposed orders are provided in editable RTF format for the Court's convenience, with PDF courtesy copies if useful. This email is copied to Plaintiffs' counsel and, though only Plaintiff has appeared as of the time of this email, to all parties on whom Proposed Intervenor has served the filing by email. No ex parte communication is intended.

Respectfully,


Gregory C. Belmont
Proposed Intervenor, Pro Se



EXHIBIT B: Email to Plaintiff's Counsel Referencing Telephone Notification




BAM v Schneider Service

From Gregory C. Belmont (CereBel) 

Date Tue 6/16/2026 1:29 AM

To

Cc

 1 attachment (201 KB)

BelmontDentonsCallLog061626.pdf;


Mr. Rich,

Attached are logs from my personal mobile phone documenting the telephone calls I placed to your firm after serving my filings by email. On the June 11 call, after speaking with the receptionist and being directed to extensions, I heard a message at extension 4781 indicating that voicemails were not accepted, and then left a voicemail at extension 4774. On the June 15 call, your firm's receptionist placed me on hold while attempting to reach Mr. Ghobrial, then returned to the line and informed me that she would share my contact information and request for acknowledgment of receipt with each of you.

I provide this information only to clarify the service history and my efforts to ensure actual notice of the filings.

In any event, I am open to stipulating to a motion schedule and/or discussing other procedural accommodations.

Best regards,
-GCB

Gregory C. Belmont


DRAFT

Screen Shot of Call Log on Belmont iPhone 17 (captured June 16)

