

1 THE ESTATE OF TOMMY MORRISON
Patricia Harding Morrison
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*Plaintiff, Personal Representative and
Administratrix for the Estate of Tommy Morrison*

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7 **UNITED STATES FEDERAL COURT**

8 **IN AND FOR THE DISTRICT OF NEVADA - SOUTHERN DIVISION**

9 ESTATE FOR TOMMY MORRISON) Case No.: 2:14-cv-01207-RFB-BNW
10 Administratrix, Personal Representative,) Judge: Hon. Richard F. Boulware, II
Patricia Harding Morrison,)
11)
12 Plaintiff,) **PLAINTIFF MORRISON'S**
13 vs.) **SECOND DECLARATION**
14) **IN SUPPORT OF MOTION**
15 Quest Diagnostics Incorporated; John) **FOR DNA/HIV TESTING**
Hiatt; Dr. Margaret Goodman; Nevada) **ON NEWLY DISCOVERED**
16 State Athletic Commission; Marc Ratner,) **PRESERVED TISSUE BELONGING**
17 Defendants,) **TO TOMMY MORRISON**
18) - Trial By Jury -
)

19 I, Patricia Harding Morrison, hereby moves this Honorable Court to respectfully
20 grant **DNA/ HIV Testing on newly discovered PRESERVED TISSUE belonging to**
21 **TOMMY MORRISON and DECLARE** the following:

- 22 1. I am the Plaintiff, *Pro Se* in the above-entitled case representing the ESTATE for
23 Tommy Morrison.
24 2. I am over the age of 18 years and am a party to this action. I have personal knowledge
25 of the following facts stated in this declaration, and if called as a witness, I
26 could and would testify competently to the truth of the facts as stated herein.

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- 3 3. I make this declaration in support of my motion to request **DNA / HIV testing on**
- 4 **newly discovered PRESERVED TISSUE belonging to TOMMY**
- 5 **MORRISON.**
- 6 4. I make this declaration also in opposition to Defendants' Counterclaim for a prefilng
- 7 order, sanctions, and defense attorney's fees for having filed appeals in the 9th Circuit
- 8 Court and the U.S. Supreme Court and now for DNA/HIV testing on a newly
- 9 discovered preserved tissue belonging to Tommy Morrison.
- 10 5. I declare that I am not a vexatious litigant. A review of the unopposed and undisputed
- 11 TIMELINE in dkt#325 demonstrates where I plead important facts
- 12 uncovered with every motion filed in the last 6 years. These important facts could
- 13 have been disclosed by the defendants and their defense counsels 6 years ago and I
- 14 would not have had to file these motions at all.
- 15 6. I declare **again**, that when the identity of my Expert Witness, the Former 1996 CEO
- 16 of Defendants' lab in Las Vegas, was revealed in this case, he suddenly went "silent"
- 17 and stopped communicating with me after Defendants contacted him to schedule a
- 18 deposition. His Affidavit is on the Record and clearly sides with the ESTATE and not
- 19 the Defendants.
- 20 7. I declare **the threats were and are real**: that when the identity of my Expert
- 21 Rebuttal Witness was released, he spent the first 30 minutes on the Record during his
- 22 deposition describing the death and harassment threats he and his family received,
- 23 and break ins.
- 24 8. I declare **again**, that I too have been, and still am, threatened along with character
- 25 assassination tactics on social media since I filed this case.
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9. I declare that I sent an ex-parte communication email directly to the Judge's Chambers through Blanca Lenzi with the location of the newly discovered preserved tissue belonging to Tommy Morrison marked as EXHIBIT 'X'.
 10. I declare that EXHIBIT 'X' was sent to the Judge's Chambers because I **truly** fear that Defendants may seek and taint and destroy the remains of Tommy Morrison before the Court grants my Motion for DNA/HIV testing.
 11. I declare that this Court has not ruled on a Pre-Filing Order and that I spoke with Justin in the Dockets Department and that my Reply Brief to #326 and #327 would be due for filing by August 25th, 2020.
 12. I declare that this case was filed **Pro Se** because I had no option because I was told by numerous attorneys in Las Vegas that they would not go up against the *Nevada State Attorney General's Office* because their kids go to school with *their kids*, they brush shoulders at the same events and dinners, and most importantly they needed their jobs and their families to be safe living in Las Vegas.
 13. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

18 DATED: August ____, 2020

Respectfully submitted by:

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Patricia Harding Morrison,
PO BOX 454 ROSE HILL KANSAS 67133
Plaintiff, Pro Se & Administratrix
For The Estate of Tommy Morrison