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IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

DRAGONFLY ENERGY CORP., a Nevada
corporation

Plaintiff,

vs.

WILLIAM ERROL PROWSE IV, an
individual, and PROWSE PUBLICATIONS
LLC, a Nevada limited liability company

Defendants.

Case No. CV26-01604

Dept. No. 1

**DEFENDANTS WILLIAM ERROL
PROWSE IV AND PROWSE
PUBLICATIONS LLC'S ANSWER TO
AMENDED COMPLAINT**

ANSWER

Defendants William Errol Prowse IV and Prowse Publications ("collectively Defendants"),
by and through its counsel, Snell & Wilmer L.L.P., hereby respond to Plaintiff's Amended
Complaint, dated July 9, 2026 (the "Complaint"), as follows:

PARTIES

1. Answering paragraph 1 of the Complaint, Defendants lack sufficient information
upon which to form a belief as to the truth of the allegations contained therein and therefore deny
the same.

2. Answering paragraph 2 of the Complaint, admit.

3. Answering paragraph 3 of the Complaint, admit.

JURISDICTION AND VENUE

4. Answering paragraph 4 of the Complaint, Defendants state that paragraph 4 contains

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1 legal conclusions to which a response is not required. To the extent a response is required,
2 Defendants deny the allegations.

3 5. Answering paragraph 5 of the Complaint, Defendants state that paragraph 5 contains
4 legal conclusions to which a response is not required. To the extent a response is required,
5 Defendants deny the allegations.

6 **FACTUAL ALLEGATIONS**

7 6. Answering paragraph 6 of the Complaint, Defendants lack sufficient information
8 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
9 the same.

10 7. Answering paragraph 7 of the Complaint, Defendants lack sufficient information
11 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
12 the same.

13 8. Answering paragraph 8 of the Complaint, Defendants lack sufficient information
14 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
15 the same.

16 9. Answering paragraph 9 of the Complaint, Defendants lack sufficient information
17 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
18 the same.

19 10. Answering paragraph 10 of the Complaint, Defendants lack sufficient information
20 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
21 the same.

22 11. Answering paragraph 11 of the Complaint, Defendants lack sufficient information
23 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
24 the same.

25 12. Answering paragraph 12 of the Complaint, Defendants lack sufficient information
26 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
27 the same.

28 13. Answering paragraph 13 of the Complaint, Defendants lack sufficient information

upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

14. Answering paragraph 14 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

15. Answering paragraph 15 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

16. Answering paragraph 16 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

17. Answering paragraph 17 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

18. Answering paragraph 18 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

19. Answering paragraph 19 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

20. Answering paragraph 20 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

21. Answering paragraph 21 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

22. Answering paragraph 22 of the Complaint, admit.

23. Answering paragraph 23 of the Complaint, Defendants admit that Prowse owns and

operates the website diysolarfarm.com. Defendants further admit that the website has over 165,000 members. The contents of that website speak for themselves. Defendants further admit that Prowse has a Facebook group with over 450,000 members. Except as expressly admitted, Defendants deny the allegations.

24. Answering paragraph 24 of the Complaint, Defendants admit, except to the extent that the allegations of paragraph 24 characterize or summarize the contents of Defendants' YouTube channel. To that extent, the allegations are denied.

25. Answering paragraph 25 of the Complaint, admit.

26. Answering paragraph 26 of the Complaint, Defendants state that paragraph 26 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

27. Answering paragraph 27 of the Complaint, Defendants state that paragraph 27 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

28. Answering paragraph 28 of the Complaint, Defendants state that paragraph 28 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

29. Answering paragraph 29 of the Complaint, Defendants deny the allegations.

30. Answering paragraph 30 of the Complaint, Defendants deny the allegations.

31. The allegations contained within paragraph 31 of the Complaint characterize or summarize documents which fully and adequately speak for themselves, and said allegations therefore misstate said documents. The allegations are therefore denied for these reasons..

32. The allegations contained within paragraph 32 of the Complaint characterize or summarize documents which fully and adequately speak for themselves, and said allegations therefore misstate said documents. The allegations are therefore denied for these reasons.

33. The allegations contained within paragraph 33 of the Complaint characterize or summarize videos and documents which fully and adequately speak for themselves, and said allegations therefore misstate said videos and documents. The allegations are therefore denied for

1 these reasons.

2 34. The allegations contained within paragraph 34 of the Complaint characterize or
3 summarize videos and documents which fully and adequately speak for themselves, and said
4 allegations therefore misstate said videos and documents. The allegations are therefore denied for
5 these reasons.

6 35. The allegations contained within paragraph 35 of the Complaint characterize or
7 summarize documents which fully and adequately speak for themselves, and said allegations
8 therefore misstate said documents. The allegations are therefore denied for these reasons.

9 36. Answering paragraph 36 of the Complaint, Defendants admit that Prowse has tested
10 Battle Borne batteries and therefore has familiarized himself with them to that extent. Except as
11 expressly admitted, Defendants deny the allegations.

12 37. The allegations contained within paragraph 37 of the Complaint characterize or
13 summarize videos which fully and adequately speak for themselves, and said allegations therefore
14 misstate said videos. The allegations are therefore denied for these reasons.

15 38. Answering paragraph 38 of the Complaint, Defendants deny the allegations.

16 39. Answering paragraph 39 of the Complaint, Defendants admit that Prowse visited
17 Dragonfly's Reno facility. Except as expressly admitted, Defendants deny the allegations.

18 40. The allegations contained within paragraph 40 of the Complaint characterize or
19 summarize videos which fully and adequately speak for themselves, and said allegations therefore
20 misstate said videos. The allegations are therefore denied for these reasons.

21 41. Answering paragraph 41 of the Complaint, Defendants deny the allegations.

22 42. The allegations contained within paragraph 42 of the Complaint characterize or
23 summarize documents which fully and adequately speak for themselves, and said allegations
24 therefore misstate said documents. The allegations are therefore denied for these reasons.

25 43. The allegations contained within paragraph 43 of the Complaint characterize or
26 summarize documents which fully and adequately speak for themselves, and said allegations
27 therefore misstate said documents. The allegations are therefore denied for these reasons.

28 44. Answering paragraph 44 of the Complaint, Defendants deny the allegations.

1 45. The allegations contained within paragraph 45 of the Complaint characterize or
2 summarize videos which fully and adequately speak for themselves, and said allegations therefore
3 misstate said videos. The allegations are therefore denied for these reasons.

4 46. Answering paragraph 46 of the Complaint, Defendants deny the allegations.

5 47. Answering paragraph 47 of the Complaint, Defendants deny the allegations.

6 48. Answering paragraph 48 of the Complaint, Defendants deny the allegations.

7 49. Answering paragraph 49 of the Complaint, Defendants deny the allegations.

8 50. Answering paragraph 50 of the Complaint, admit.

9 51. Answering paragraph 51 of the Complaint, admit.

10 52. The allegations contained within paragraph 52 of the Complaint characterize or
11 summarize videos which fully and adequately speak for themselves, and said allegations therefore
12 misstate said videos. The allegations are therefore denied for these reasons.

13 53. The allegations contained within paragraph 53 of the Complaint characterize or
14 summarize videos which fully and adequately speak for themselves, and said allegations therefore
15 misstate said videos. The allegations are therefore denied for these reasons.

16 54. The allegations contained within paragraph 54 of the Complaint characterize or
17 summarize videos which fully and adequately speak for themselves, and said allegations therefore
18 misstate said videos. The allegations are therefore denied for these reasons.

19 55. The allegations contained within paragraph 55 of the Complaint characterize or
20 summarize videos which fully and adequately speak for themselves, and said allegations therefore
21 misstate said videos. The allegations are therefore denied for these reasons.

22 56. Answering paragraph 56 of the Complaint, Defendants state that paragraph 66
23 contains legal conclusions to which a response is not required. To the extent a response is required,
24 Defendants deny the allegations.

25 57. Answering paragraph 57 of the Complaint, Defendants lack sufficient information
26 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
27 the same.

28 58. Answering paragraph 58 of the Complaint, Defendants lack sufficient information

1 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
2 the same.

3 59. Answering paragraph 59 of the Complaint, Defendants state that paragraph 59
4 contains legal conclusions to which a response is not required. To the extent a response is required,
5 Defendants deny the allegations.

6 60. Answering paragraph 60 of the Complaint, admit.

7 61. Answering paragraph 61 of the Complaint, admit.

8 62. The allegations contained within paragraph 62 of the Complaint characterize or
9 summarize videos which fully and adequately speak for themselves, and said allegations therefore
10 misstate said videos. The allegations are therefore denied for these reasons.

11 63. The allegations contained within paragraph 63 of the Complaint characterize or
12 summarize videos which fully and adequately speak for themselves, and said allegations therefore
13 misstate said videos. The allegations are therefore denied for these reasons.

14 64. Answering paragraph 64 of the Complaint, Defendants lack sufficient information
15 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
16 the same.

17 65. Answering paragraph 65 of the Complaint, Defendants deny the allegations.

18 66. Answering paragraph 66 of the Complaint, Defendants state that paragraph 66
19 contains legal conclusions to which a response is not required. To the extent a response is required,
20 Defendants deny the allegations.

21 67. Answering paragraph 67 of the Complaint, Defendants state that paragraph 67
22 contains legal conclusions to which a response is not required. To the extent a response is required,
23 Defendants deny the allegations.

24 68. Answering paragraph 68 of the Complaint, admit.

25 69. Answering paragraph 69 of the Complaint, admit.

26 70. The allegations contained within paragraph 70 of the Complaint characterize or
27 summarize videos which fully and adequately speak for themselves, and said allegations therefore
28 misstate said videos. The allegations are therefore denied for these reasons.

1 71. The allegations contained within paragraph 71 of the Complaint characterize or
2 summarize videos which fully and adequately speak for themselves, and said allegations therefore
3 misstate said videos. The allegations are therefore denied for these reasons.

4 72. Answering paragraph 72 of the Complaint, Defendants lack sufficient information
5 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
6 the same.

7 73. Answering paragraph 73 of the Complaint, Defendants state that paragraph 73
8 contains legal conclusions to which a response is not required. To the extent a response is required,
9 Defendants deny the allegations.

10 74. Answering paragraph 74 of the Complaint, Defendants state that paragraph 74
11 contains legal conclusions to which a response is not required. To the extent a response is required,
12 Defendants deny the allegations.

13 75. Answering paragraph 75 of the Complaint, Defendants lack sufficient information
14 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
15 the same.

16 76. Answering paragraph 76 of the Complaint, Defendants state that paragraph 76
17 contains legal conclusions to which a response is not required. To the extent a response is required,
18 Defendants deny the allegations.

19 77. Answering paragraph 77 of the Complaint, admit.

20 78. Answering paragraph 78 of the Complaint, admit.

21 79. The allegations contained within paragraph 79 of the Complaint characterize or
22 summarize videos which fully and adequately speak for themselves, and said allegations therefore
23 misstate said videos. The allegations are therefore denied for these reasons.

24 80. The allegations contained within paragraph 80 of the Complaint characterize or
25 summarize videos which fully and adequately speak for themselves, and said allegations therefore
26 misstate said videos. The allegations are therefore denied for these reasons.

27 81. The allegations contained within paragraph 81 of the Complaint characterize or
28 summarize videos which fully and adequately speak for themselves, and said allegations therefore

misstate said videos. The allegations are therefore denied for these reasons.

82. Answering paragraph 82 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

83. Answering paragraph 83 of the Complaint, Defendants state that paragraph 83 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

84. Answering paragraph 84 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

85. Answering paragraph 85 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

86. Answering paragraph 86 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

87. Answering paragraph 87 of the Complaint, Defendants state that paragraph 87 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

88. Answering paragraph 88 of the Complaint, admit.

89. Answering paragraph 89 of the Complaint, admit.

90. The allegations contained within paragraph 90 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

91. The allegations contained within paragraph 91 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

92. Answering paragraph 92 of the Complaint, Defendants state that paragraph 92

contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

93. Answering paragraph 93 of the Complaint, Defendants state that paragraph 93 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

94. Answering paragraph 94 of the Complaint, admit.

95. Answering paragraph 95 of the Complaint, admit.

96. The allegations contained within paragraph 96 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

97. The allegations contained within paragraph 97 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

98. Answering paragraph 98 of the Complaint, Defendants state that paragraph 98 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

99. Answering paragraph 99 of the Complaint, Defendants state that paragraph 99 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

100. Answering paragraph 100 of the Complaint, Defendants state that paragraph 100 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

101. Answering paragraph 101 of the Complaint, admit.

102. Answering paragraph 102 of the Complaint, admit.

103. The allegations contained within paragraph 103 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

104. The allegations contained within paragraph 104 of the Complaint characterize or

1 summarize videos which fully and adequately speak for themselves, and said allegations therefore
2 misstate said videos. The allegations are therefore denied for these reasons.

3 105. The allegations contained within paragraph 105 of the Complaint characterize or
4 summarize videos which fully and adequately speak for themselves, and said allegations therefore
5 misstate said videos. The allegations are therefore denied for these reasons.

6 106. Answering paragraph 106 of the Complaint, Defendants state that paragraph 106
7 contains legal conclusions to which a response is not required. To the extent a response is required,
8 Defendants deny the allegations.

9 107. Answering paragraph 107 of the Complaint, Defendants state that paragraph 107
10 contains legal conclusions to which a response is not required. To the extent a response is required,
11 Defendants deny the allegations.

12 108. Answering paragraph 108 of the Complaint, admit.

13 109. Answering paragraph 109 of the Complaint, admit.

14 110. The allegations contained within paragraph 110 of the Complaint characterize or
15 summarize videos which fully and adequately speak for themselves, and said allegations therefore
16 misstate said videos. The allegations are therefore denied for these reasons.

17 111. The allegations contained within paragraph 111 of the Complaint characterize or
18 summarize videos which fully and adequately speak for themselves, and said allegations therefore
19 misstate said videos. The allegations are therefore denied for these reasons.

20 112. The allegations contained within paragraph 112 of the Complaint characterize or
21 summarize videos which fully and adequately speak for themselves, and said allegations therefore
22 misstate said videos. The allegations are therefore denied for these reasons.

23 113. Answering paragraph 113 of the Complaint, Defendants state that paragraph 113
24 contains legal conclusions to which a response is not required. To the extent a response is required,
25 Defendants deny the allegations.

26 114. Answering paragraph 114 of the Complaint, Defendants state that paragraph 114
27 contains legal conclusions to which a response is not required. To the extent a response is required,
28 Defendants deny the allegations.

1 115. The allegations contained within paragraph 115 of the Complaint characterize or
2 summarize videos which fully and adequately speak for themselves, and said allegations therefore
3 misstate said videos. The allegations are therefore denied for these reasons.

4 116. Answering paragraph 116 of the Complaint, Defendants lack sufficient information
5 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
6 the same.

7 117. Answering paragraph 117 of the Complaint, Defendants state that paragraph 117
8 contains legal conclusions to which a response is not required. To the extent a response is required,
9 Defendants deny the allegations.

10 118. Answering paragraph 118 of the Complaint, admit.

11 119. Answering paragraph 119 of the Complaint, admit.

12 120. The allegations contained within paragraph 120 of the Complaint characterize or
13 summarize videos which fully and adequately speak for themselves, and said allegations therefore
14 misstate said videos. The allegations are therefore denied for these reasons.

15 121. Answering paragraph 121 of the Complaint, Defendants lack sufficient information
16 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
17 the same.

18 122. The allegations contained within paragraph 122 of the Complaint characterize or
19 summarize videos which fully and adequately speak for themselves, and said allegations therefore
20 misstate said videos. The allegations are therefore denied for these reasons.

21 123. Answering paragraph 123 of the Complaint, Defendants state that paragraph 123
22 contains legal conclusions to which a response is not required. To the extent a response is required,
23 Defendants deny the allegations.

24 124. Answering paragraph 124 of the Complaint, Defendants state that paragraph 124
25 contains legal conclusions to which a response is not required. To the extent a response is required,
26 Defendants deny the allegations.

27 125. Answering paragraph 125 of the Complaint, admit.

28 126. Answering paragraph 126 of the Complaint, admit.

1 127. The allegations contained within paragraph 127 of the Complaint characterize or
2 summarize videos which fully and adequately speak for themselves, and said allegations therefore
3 misstate said videos. The allegations are therefore denied for these reasons.

4 128. Answering paragraph 128 of the Complaint, Defendants state that paragraph 128
5 contains legal conclusions to which a response is not required. To the extent a response is required,
6 Defendants deny the allegations.

7 129. Answering paragraph 129 of the Complaint, Defendants state that paragraph 129
8 contains legal conclusions to which a response is not required. To the extent a response is required,
9 Defendants deny the allegations.

10 130. Answering paragraph 130 of the Complaint, Defendants state that paragraph 130
11 contains legal conclusions to which a response is not required. To the extent a response is required,
12 Defendants deny the allegations.

13 131. Answering paragraph 131 of the Complaint, admit.

14 132. Answering paragraph 132 of the Complaint, admit.

15 133. The allegations contained within paragraph 133 of the Complaint characterize or
16 summarize videos which fully and adequately speak for themselves, and said allegations therefore
17 misstate said videos. The allegations are therefore denied for these reasons.

18 134. The allegations contained within paragraph 134 of the Complaint characterize or
19 summarize videos which fully and adequately speak for themselves, and said allegations therefore
20 misstate said videos. The allegations are therefore denied for these reasons.

21 135. Answering paragraph 135 of the Complaint, Defendants state that paragraph 135
22 contains legal conclusions to which a response is not required. To the extent a response is required,
23 Defendants deny the allegations.

24 136. Answering paragraph 136 of the Complaint, Defendants state that paragraph 136
25 contains legal conclusions to which a response is not required. To the extent a response is required,
26 Defendants deny the allegations.

27 137. Answering paragraph 137 of the Complaint, admit.

28 138. Answering paragraph 138 of the Complaint, admit.

139. The allegations contained within paragraph 139 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

140. Answering paragraph 140 of the Complaint, Defendants deny the allegations.

141. Answering paragraph 141 of the Complaint, admit.

142. Answering paragraph 142 of the Complaint, admit.

143. The allegations contained within paragraph 143 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

144. The allegations contained within paragraph 144 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

145. The allegations contained within paragraph 145 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

146. The allegations contained within paragraph 146 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

147. Answering paragraph 147 of the Complaint, Defendants state that paragraph 147 contains legal conclusions to which a response is not required. To the extent a response is required, Defendants deny the allegations.

148. Answering paragraph 148 of the Complaint, admit.

149. Answering paragraph 149 of the Complaint, admit.

150. The allegations contained within paragraph 150 of the Complaint characterize or summarize videos which fully and adequately speak for themselves, and said allegations therefore misstate said videos. The allegations are therefore denied for these reasons.

151. Answering paragraph 151 of the Complaint, Defendants deny the allegations.

152. The allegations contained within paragraph 152 of the Complaint characterize or

1 summarize videos which fully and adequately speak for themselves, and said allegations therefore
2 misstate said videos. The allegations are therefore denied for these reasons.

3 153. Answering paragraph 153 of the Complaint, admit.

4 154. Answering paragraph 154 of the Complaint, admit.

5 155. The allegations contained within paragraph 155 of the Complaint characterize or
6 summarize videos which fully and adequately speak for themselves, and said allegations therefore
7 misstate said videos. The allegations are therefore denied for these reasons.

8 156. Answering paragraph 156 of the Complaint, Defendants deny the allegations.

9 157. The allegations contained within paragraph 157 of the Complaint characterize or
10 summarize videos and documents which fully and adequately speak for themselves, and said
11 allegations therefore misstate said videos and documents. The allegations are therefore denied for
12 these reasons.

13 158. The allegations contained within paragraph 158 of the Complaint characterize or
14 summarize videos and documents which fully and adequately speak for themselves, and said
15 allegations therefore misstate said videos and documents. The allegations are therefore denied for
16 these reasons.

17 159. The allegations contained within paragraph 159 of the Complaint characterize or
18 summarize videos and documents which fully and adequately speak for themselves, and said
19 allegations therefore misstate said videos and documents. The allegations are therefore denied for
20 these reasons.

21 160. The allegations contained within paragraph 160 of the Complaint characterize or
22 summarize videos and documents which fully and adequately speak for themselves, and said
23 allegations therefore misstate said videos and documents. The allegations are therefore denied for
24 these reasons.

25 161. The allegations contained within paragraph 161 of the Complaint characterize or
26 summarize videos and documents which fully and adequately speak for themselves, and said
27 allegations therefore misstate said videos and documents. The allegations are therefore denied for
28 these reasons.

1 162. The allegations contained within paragraph 162 of the Complaint characterize or
2 summarize videos and documents which fully and adequately speak for themselves, and said
3 allegations therefore misstate said videos and documents. The allegations are therefore denied for
4 these reasons.

5 163. The allegations contained within paragraph 163 of the Complaint characterize or
6 summarize videos and documents which fully and adequately speak for themselves, and said
7 allegations therefore misstate said videos and documents. The allegations are therefore denied for
8 these reasons.

9 164. The allegations contained within paragraph 164 of the Complaint characterize or
10 summarize videos and documents which fully and adequately speak for themselves, and said
11 allegations therefore misstate said videos and documents. The allegations are therefore denied for
12 these reasons.

13 165. The allegations contained within paragraph 165 of the Complaint characterize or
14 summarize documents which fully and adequately speak for themselves, and said allegations
15 therefore misstate said documents. The allegations are therefore denied for these reasons.

16 166. The allegations contained within paragraph 166 of the Complaint characterize or
17 summarize documents which fully and adequately speak for themselves, and said allegations
18 therefore misstate said documents. The allegations are therefore denied for these reasons.

19 167. The allegations contained within paragraph 167 of the Complaint characterize or
20 summarize documents which fully and adequately speak for themselves, and said allegations
21 therefore misstate said documents. The allegations are therefore denied for these reasons.

22 168. The allegations contained within paragraph 168 of the Complaint characterize or
23 summarize documents which fully and adequately speak for themselves, and said allegations
24 therefore misstate said documents. The allegations are therefore denied for these reasons.

25 169. The allegations contained within paragraph 169 of the Complaint characterize or
26 summarize documents which fully and adequately speak for themselves, and said allegations
27 therefore misstate said documents. The allegations are therefore denied for these reasons.

28 170. The allegations contained within paragraph 170 of the Complaint characterize or

1 summarize documents which fully and adequately speak for themselves, and said allegations
2 therefore misstate said documents. The allegations are therefore denied for these reasons.

3 171. Answering paragraph 171 of the Complaint, Defendants lack sufficient information
4 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
5 the same.

6 172. Answering paragraph 172 of the Complaint, Defendants lack sufficient information
7 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
8 the same.

9 173. Answering paragraph 173 of the Complaint, admit.

10 174. Answering paragraph 174 of the Complaint, Defendants lack sufficient information
11 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
12 the same.

13 175. Answering paragraph 175 of the Complaint, admit.

14 176. Answering paragraph 176 of the Complaint, Defendants lack sufficient information
15 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
16 the same.

17 177. Answering paragraph 177 of the Complaint, admit.

18 178. Answering paragraph 178 of the Complaint, Defendants lack sufficient information
19 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
20 the same.

21 179. Answering paragraph 179 of the Complaint, admit.

22 180. Answering paragraph 180 of the Complaint, Defendants lack sufficient information
23 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
24 the same.

25 181. Answering paragraph 181 of the Complaint, admit.

26 182. Answering paragraph 182 of the Complaint, Defendants lack sufficient information
27 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
28 the same.

1 183. The allegations contained within paragraph 183 of the Complaint characterize or
2 summarize documents which fully and adequately speak for themselves, and said allegations
3 therefore misstate said documents. The allegations are therefore denied for these reasons.

4 184. The allegations contained within paragraph 184 of the Complaint characterize or
5 summarize documents which fully and adequately speak for themselves, and said allegations
6 therefore misstate said documents. The allegations are therefore denied for these reasons.

7 185. Answering paragraph 185 of the Complaint. Defendants deny.

8 186. Answering paragraph 186 of the Complaint, Defendants deny.

9 187. Answering paragraph 187 of the Complaint, Defendants state that paragraph 187
10 contains legal conclusions to which a response is not required. To the extent a response is required,
11 Defendants deny the allegations.

12 188. Answering paragraph 188 of the Complaint, Defendants lack sufficient information
13 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
14 the same.

15 189. Answering paragraph 189 of the Complaint, Defendants state that paragraph 189
16 contains legal conclusions to which a response is not required. To the extent a response is required,
17 Defendants deny the allegations.

18 190. Answering paragraph 190 of the Complaint, Defendants lack sufficient information
19 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
20 the same.

21 191. The allegations contained within paragraph 191 of the Complaint characterize or
22 summarize videos which fully and adequately speak for themselves, and said allegations therefore
23 misstate videos. The allegations are therefore denied for these reasons.

24 192. The allegations contained within paragraph 192 of the Complaint characterize or
25 summarize videos which fully and adequately speak for themselves, and said allegations therefore
26 misstate videos. The allegations are therefore denied for these reasons.

27 193. The allegations contained within paragraph 193 of the Complaint characterize or
28 summarize videos which fully and adequately speak for themselves, and said allegations therefore

1 misstate videos. The allegations are therefore denied for these reasons.

2 194. The allegations contained within paragraph 194 of the Complaint characterize or
3 summarize videos which fully and adequately speak for themselves, and said allegations therefore
4 misstate videos. The allegations are therefore denied for these reasons.

5 195. The allegations contained within paragraph 195 of the Complaint characterize or
6 summarize videos which fully and adequately speak for themselves, and said allegations therefore
7 misstate videos. The allegations are therefore denied for these reasons.

8 196. The allegations contained within paragraph 196 of the Complaint characterize or
9 summarize videos and documents which fully and adequately speak for themselves, and said
10 allegations therefore misstate said videos and documents. The allegations are therefore denied for
11 these reasons.

12 197. The allegations contained within paragraph 197 of the Complaint characterize or
13 summarize videos and documents which fully and adequately speak for themselves, and said
14 allegations therefore misstate said videos and documents. The allegations are therefore denied for
15 these reasons.

16 198. The allegations contained within paragraph 198 of the Complaint characterize or
17 summarize videos and documents which fully and adequately speak for themselves, and said
18 allegations therefore misstate said videos and documents. The allegations are therefore denied for
19 these reasons.

20 199. Answering paragraph 199 of the Complaint, Defendants lack sufficient information
21 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
22 the same.

23 200. Answering paragraph 200 of the Complaint, Defendants state that paragraph 200
24 contains legal conclusions to which a response is not required. To the extent a response is required,
25 Defendants deny the allegations.

26 201. Answering paragraph 201 of the Complaint, Defendants lack sufficient information
27 upon which to form a belief as to the truth of the allegations contained therein and therefore deny
28 the same.

202. Answering paragraph 202 of the Complaint, Defendants deny that there was a “campaign.” Otherwise, admit.

203. Answering paragraph 203 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

204. Answering paragraph 204 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

205. Answering paragraph 205 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

206. Answering paragraph 206 of the Complaint, Defendants lack sufficient information upon which to form a belief as to the truth of the allegations contained therein and therefore deny the same.

207. Answering paragraph 207 of the Complaint, Defendants deny.

FIRST CLAIM FOR RELIEF

(Trade Libel/Business Disparagement – Against Both Defendants)

208. Defendants repeat and reallege their responses to paragraphs 1 through 207 as though fully set forth herein.

209. Defendants deny the truth of the allegations in paragraph 209.

210. Defendants deny the truth of the allegations in paragraph 210.

211. Defendants deny the truth of the allegations in paragraph 211.

212. Defendants deny the truth of the allegations in paragraph 212.

213. Defendants deny the truth of the allegations in paragraph 213.

214. Defendants deny the truth of the allegations in paragraph 214.

215. Defendants deny the truth of the allegations in paragraph 215.

216. Defendants deny the truth of the allegations in paragraph 216.

217. Defendants deny the truth of the allegations in paragraph 217.

SECOND CLAIM FOR RELIEF

(Unfair Competition/Deceptive Trade Practices in violation of the Nevada Deceptive Trade Practices Act – Against Both Defendants)

218. Defendants repeat and reallege their responses to paragraphs 1 through 217 as though fully set forth herein.

219. Defendants deny the truth of the allegations in paragraph 219.

220. Defendants deny the truth of the allegations in paragraph 220.

221. Defendants deny the truth of the allegations in paragraph 221.

222. Defendants deny the truth of the allegations in paragraph 222.

THIRD CLAIM FOR RELIEF

(Intentional Interference with Economic Advantage – Against Both Defendants)

223. Defendants repeat and reallege their responses to paragraphs 1 through 222 as though fully set forth herein.

224. Defendants deny the truth of the allegations in paragraph 224.

225. Defendants deny the truth of the allegations in paragraph 225.

226. Defendants deny the truth of the allegations in paragraph 226.

227. Defendants deny the truth of the allegations in paragraph 227.

228. Defendants deny the truth of the allegations in paragraph 228.

FOURTH CLAIM FOR RELIEF

(Injunctive Relief – Against Both Defendants)

229. Defendants repeat and reallege their responses to paragraphs 1 through 228 as though fully set forth herein.

230. Defendants deny the truth of the allegations in paragraph 230.

231. Defendants deny the truth of the allegations in paragraph 231.

232. Defendants deny the truth of the allegations in paragraph 232.

RESPONSE TO PRAYER FOR RELIEF

Defendants deny that Plaintiff is entitled to any judgment, injunctive relief, damages, attorneys' fees and costs, or other relief against Defendants as set forth in the prayer for relief.

AFFIRMATIVE DEFENSES

1. Plaintiff's Complaint fails to state a claim against Defendants upon which relief can be granted.

2. Plaintiff's claims are barred by the applicable statutes of limitations and repose.

3. Plaintiff's claims are barred in whole or in part by the equitable doctrine of laches, equitable estoppel, and unclean hands.

4. Plaintiff has, through its own actions, waived any right to assert its claims.

5. To the extent Plaintiff is entitled to any relief, it is offset by its failure to mitigate damages.

6. Plaintiff's alleged damages are caused by its own acts or failures to act.

7. Plaintiff's alleged damages resulted from independent, unforeseeable, superseding and/or intervening causes unrelated to Defendants' acts or omissions.

8. Plaintiff's claims are barred by the common-interest privilege. Any allegedly actionable statements were made in good faith to protect the interests of Defendant's internet followers and pertained to a subject important to his audience: the apparent overheating and ignition of Plaintiff's batteries. Defendants did not abuse the qualified privilege because, to the extent his claims were inaccurate, he did not know them to be so and he was not reckless as to whether they were true.

9. Defendants are media defendants. Thus, to the extent any of Plaintiff's claims is based on alleged defamation, Plaintiff must demonstrate culpability and actual damages.

10. Defendants' statements pertained to a matter of public interest. Thus, to the extent any of Plaintiff's claims is based on alleged defamation, Plaintiff must prove either actual damages or, by clear and convincing evidence, that Defendants' statements were knowingly false or made with a reckless disregard for the truth.

11. Plaintiff is either an all-purpose or limited public figure. Thus, as to all claims, Plaintiffs must demonstrate, through clear and convincing evidence, that Defendants' statements were knowingly false or reckless disregard for the truth, and must demonstrate actual damages.

12. All possible affirmative defenses may not have been alleged insofar as sufficient

facts are not available after reasonable inquiry upon the filing of Plaintiff's Complaint. Therefore, Defendants reserve the right to amend this Answer to allege additional affirmative defenses and claims, counterclaims, crossclaims, or third-party claims, as applicable, upon further investigation and discovery. Additionally, Defendants adopt by reference any applicable defense asserted by any other defendants to the extent that they may share that defense.

PRAYER

WHEREFORE, having fully defended, Defendants pray for judgment as follows:

1. That Plaintiff's Complaint be dismissed with prejudice and that Plaintiff take nothing thereby;
2. That Defendants be awarded their attorney's fees and costs; and
3. For any such other and further relief as the Court may deem just and proper.

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned affirms that the preceding document does not contain the personal information of any person.

Dated: July 23, 2026

SNELL & WILMER L.L.P.

/s/ Jacey Prupas

Jacey Prupas (NV Bar No. 9156)
Gil Kahn (NV Bar No. 14220)
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Attorney for Defendants

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **ANSWER TO COMPLAINT** by method indicated below:

 X **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court’s Service List for the above-referenced case.

DATED July 23, 2026.

/s/ Jeanne Forrest
An employee of SNELL & WILMER L.L.P.