
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation, and Danny Lee Shelton, individually,)	
)	
)	Case No.: 07-40098-RWZ
Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
Defendants.)	
)	

**DEFENDANTS’ MOTION FOR LEAVE TO FILE TWO SUPPLEMENTAL EXHIBITS:
(A) WARRANTS FOR THE ARREST OF TOMMY SHELTON, AND
(B) PRESS RELEASE ISSUED BY FAIRFAX COUNTY POLICE DEPARTMENT**

Defendants seek leave of the Court to supplement Defendants’ reply (Doc. 233) filed on February 26, 2010. Defendants seek leave to supplement that reply with two additional exhibits:

(a) Five warrants for the arrest of Tommy Shelton, obtained by the Fairfax County Police Department (“FCPD”) on February 25, 2010, attached hereto as **Exhibit H.** (b) The March 18, 2010, FCPD press release concerning the March 16, 2010, arrest of Tommy Shelton on sexual assault charges arising from crimes that allegedly occurred in the 1990’s, attached hereto as **Exhibit I.**

Defendants could not have filed these two exhibits with Defendants’ February 26th reply because Defendants had no knowledge of the February 25 arrest warrants on February 26, and because the March 18 press release had not been released yet. Defendants were unaware of the arrest warrants until March 18, and did not obtain the arrest warrants until March 29.

These two exhibits refute Plaintiffs' assertion that Defendants' reporting of the child molestation allegations against Tommy Shelton (and Danny Lee Shelton's cover up thereof) was "uncorroborated, unfounded." (Doc. 231 p. 5).

WHEREFORE, Defendants pray the Court to allow the supplementing of Defendants' reply (Doc. 233) with the five arrest warrants as Exhibit H, and the press release as Exhibit I.

Respectfully submitted,

Dated: April 1, 2010

/s/ Gailon Arthur Joy, pro se

Gailon Arthur Joy, *pro se*
Sterling, MA 01564
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and

/s/ Robert Pickle, pro se

Robert Pickle, *pro se*
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LOCAL RULE 7.1 CERTIFICATE

The undersigned hereby attests that the Defendants have complied with the requirements of Local Rule 7.1 by having, in good faith, through counsel conferred with Plaintiffs, and Plaintiffs' counsel has represented that he opposes this motion.

Dated: April 1, 2010

/s/ Bob Pickle

Bob Pickle

AFFIDAVIT OF SERVICE

Under penalty of perjury, I, Bob Pickle, hereby certify that this document, with accompanying memorandum, affidavit, and exhibits, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 1, 2010

/s/ Bob Pickle

Bob Pickle