

EXHIBIT A

Appendix of Selected Misrepresented Allegations

Plaintiffs' Description of Allegation (with opposition page #)	Summary of Actual Amended Complaint Allegation
<p>“In connection with the DAPL protests, Earth First! Doe Defendants provided \$500,000 to extremist protestors, including Mr. Hall and Ms. Two Bulls, to form and fund the violent Red Warrior Camp at the DAPL crossing near Lake Oahe (¶ 118).” Opp at p. 5</p>	<p>Paragraph 118 does not mention Mr. Hall or Ms. Two Bulls</p>
<p>“The amended complaint adequately pleads that Ms. Two Bulls was part of the leadership of Red Warrior Camp in her role as organizer, media coordinator and fundraiser for the group. (¶¶ 31, 38, 130-32.)” Opp at p. 6 n.3</p>	<p>None of these paragraphs allege that Ms. Two Bulls was part of the leadership of RWC, that RWC had any leadership structure, or that she was a fundraiser for the group.</p>
<p>In her leadership/ media coordinator/ organizer/ fundraiser role, Ms. Two Bulls “recruited individuals, raised funds and supplies, and organized Red Warrior Camp’s attacks on DAPL construction sites. (¶¶ 31, 38-41, 120-27, 130-33, 135, 141.)” Opp. at p. 6</p>	<p>The paragraphs do not include any mention of Ms. Two Bulls organizing any attacks on DAPL construction sites or raising funds or supplies.</p> <p>Paragraphs 39-40 describe fundraising videos, and do not mention Ms. Two Bulls</p> <p>Paragraphs 120-125 describe attacks on DAPL construction sites in August and September of 2016, and allege that Mr. Hall led them. Ms. Two Bulls is not mentioned.</p> <p>Paragraph 133 describes attacks on DAPL in October of 2016. Ms. Two Bulls is not mentioned.</p> <p>Paragraph 141 describes attacks on DAPL in November of 2016. Ms. Two Bulls is not mentioned.</p>
<p>“Ms. Two Bulls, in her role as Red Warrior Camp’s media coordinator, leader, and organizer, produced or authorized the publication of these videos [described in ¶ 131, 132]. (¶¶ 31, 41)” Opp. at p. 8</p>	<p>None of the paragraphs allege that Ms. Two Bulls was a leader (or that RWC had any leadership structure), or that she produced or authored any videos.</p> <p>Paragraphs 131 and 132 describe fundraising videos, and do not mention Ms. Two Bulls. Others are identified as responsible for the videos.</p>

<p>“Ms. Two Bulls also published a series of videos recruiting protestors to join Red Warrior Camp in North Dakota and soliciting donations. (¶ 132.)” Opp. at p. 10</p>	<p>Paragraph 132 does not mention Ms. Two Bulls.</p>
<p>“Red Warrior Camp, through Two Bulls, published documentary style videos glorifying its unlawful acts of arson and destruction. (¶¶ 31, 135.)” Opp. at p. 11</p>	<p>None of the paragraphs allege that Ms. Two Bulls published any videos.</p> <p>Paragraph 135 describes one video. It does not mention Ms. Two Bulls.</p>
<p>“Greenpeace USA sent the supplies and funds raised through these drives directly to Ms. Two Bulls’ co-head of Red Warrior Camp, Mr. Hall. (Id. ¶¶126-127.)” Opp. at p. 15</p>	<p>Neither paragraph alleges that Ms. Two Bulls is a co-head of Red Warrior Camp.</p>
<p>“Energy Transfer alleges that Red Warrior Camp members, under Ms. Two Bulls’ direction and control, physically damaged or destroyed Energy Transfer property. (¶¶ 31, 38-41, 120-27, 130-33, 135, 141.)” Opp. at p. 19.</p>	<p>None of these paragraphs include allegations that Ms. Two Bulls exercised “direction and control” over RWC or any individuals associated with it.</p>
<p>“In her leadership role, Ms. Two Bulls authorized, directed, and ratified Red Warrior Camp’s activities, including its violent trespass on public and private lands, destruction of construction equipment, and harassment of Energy Transfer personnel. (¶¶ 31, 126-27, 131-33, 135, 141.)” Opp. at p. 23</p>	<p>None of these paragraphs say that Ms. Two Bulls specifically authorized, directed or ratified any of RWC’s activities (other than media statements).</p>
<p>“As Red Warrior Camp’s ‘media coordinator,’ Ms. Two Bulls published calls for violent action against Energy Transfer and DAPL. (¶ 31.)” Opp. at p. 23</p>	<p>Paragraph 31 does not allege that Ms. Two Bulls published calls for violent action.</p>
<p>Ms. Two Bulls “recruited ‘likeminded warriors’ to ‘join [Red Warrior Camp] in [their] fight for water by any means necessary’ through videos featuring anarchist riots, arson, and violent confrontation, which were intended to -- and did – incite unlawful and violent action by members of an organization she admittedly led. (¶¶ 131-33, 135, 141.)” Opp. at p. 24</p>	<p>None of these paragraphs allege anything about Ms. Two Bulls using videos to recruit people, intending to incite violence, inciting violence, or admitting that she is a leader.</p> <p>Videos mentioned in complaint at ¶131 <i>et seq.</i> are attributed to “Women Warriors Media Cooperative, led by Defendant Manuel [<i>sic</i>, no named defendant ‘Manuel’ exists].”</p>