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8 **IN THE UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF ARIZONA**
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11 XCENTRIC VENTURES, LLC, an Arizona
 corporation, d/b/a "RIPOFFREPORT.COM";
 12 ED MAGEDSON, an individual

Case No: 07-954

13 Plaintiffs,

14 v.

**MOTION FOR DECISION ON
 PRELIMINARY INJUNCTION
 AGAINST DEFENDANTS**

15 WILLIAM "BILL" STANLEY, an
 individual; WILLIAM "BILL" STANLEY
 16 d/b/a DEFAMATION ACTION.COM;
 WILLIAM "BILL" STANLEY d/b/a
 17 COMPLAINTREMOVER.COM; WILLIAM
 "BILL" STANLEY aka JIM RICKSON;
 18 WILLIAM "BILL" STANLEY aka MATT
 JOHNSON; ROBERT RUSSO, an
 19 individual; ROBERT RUSSO d/b/a
 COMPLAINTREMOVER.COM; ROBERT
 20 RUSSO d/b/a DEFENDMYNAME.COM;
 ROBERT RUSSO d/b/a QED MEDIA
 21 GROUP, L.L.C.; QED MEDIA GROUP,
 L.L.C.; QED MEDIA GROUP, L.L.C. d/b/a
 22 DEFENDMYNAME.COM; QED MEDIA
 GROUP, L.L.C. d/b/a
 23 COMPLAINTREMOVER.COM;
 DEFAMATION ACTION LEAGUE, an
 24 unincorporated association; and INTERNET
 DEFAMATION LEAGUE, an
 25 unincorporated association;

26 Defendants.
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1 ROBERT RUSSO, an individual; QED
2 MEDIA GROUP, L.L.C., a Maine limited
3 liability corporation,

4 Counterclaimants,

5 v.

6 ED MAGEDSON, an individual,

7 Counterdefendant.

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9 Plaintiffs Xcentric Ventures, L.L.C. and Ed Magedson (“Plaintiffs”) respectfully
10 request the Court to provide all parties with a decision as to the language of the
11 preliminary injunction to be entered in the present action. Plaintiffs continue to be
12 irreparably harmed by the actions of Defendants. Although the entry of the Preliminary
13 Injunction cannot prevent all wrongdoings by Defendants against Plaintiffs, an expedient
14 entry is necessary to ensure that Plaintiffs are not continually damaged by Defendants’
15 actions.

16 As the Court is aware, an evidentiary hearing on Plaintiffs’ Application for a
17 Preliminary Injunction was held before this Court on May 17, 2007. At that time, the
18 Court determined that Defendants have engaged in wrongful activities which would
19 continue absent a court order. It was also indicated by the Court that due to the egregious
20 nature of Defendants’ actions, a preliminary injunction would be entered as soon as
21 practicable to prevent any further damaging activities by Defendants.

22 Based on Defendants’ actions since the evidentiary hearing, the Court was correct
23 in concluding that absent an injunction, Defendants would continue their pattern of bad
24 acts. Attached to the present Motion are two emails received by counsel for Plaintiffs on
25 May 20, 2007. Both emails contain nearly identical language, and only the sender of the
26 email is different. See Exhibit “A”. The senders of both emails acknowledge the
27 existence of the present action, and threaten unequivocally to continue their nefarious
28

1 activities without any regard for any orders from this Court. Such action cannot be
2 allowed to continue unabated.

3 Defendants also continue to utilize their alleged ability to “optimize” Google
4 search results to ensure the placement of websites containing false and defamatory
5 statements about Plaintiffs’ counsel as a top search result. Exhibit “B” is a sample of
6 Google searches done using the names of various attorneys employed with Plaintiffs’
7 counsel. These searches show that the website(s) containing false and defamatory
8 information and created by various Defendants appear within the first two pages of search
9 results. See Exhibit “B”. Such false and defamatory statements are the exact type of
10 information that the Preliminary Injunction will cure from further publication.

11 Plaintiffs realize that the language of the Preliminary Injunction is likely difficult
12 for the Court to craft, and hopes that their proposed form provided assistance to the Court
13 in its drafting the final Preliminary Injunction. As it remains, however, Plaintiffs are
14 suffering a great hardship every day that goes without the entry of the Preliminary
15 Injunction. Plaintiffs therefore respectfully request that the Court enter the Preliminary
16 Injunction against the Defendants and enjoining the wrongfully activities of Defendants
17 from continuing at the Court’s earliest convenience.

18 DATED this 14th day of June, 2007.

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21 **JABURG & WILK, P.C.**

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24 s/ Maria Crimi Speth
25 Maria Crimi Speth
26 Attorneys for Plaintiffs
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1 **Certificate of Service**

2 I hereby certify that on June 14, 2007, I electronically transmitted the attached
3 document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of
4 a Notice of Electronic Filing to the following CM/ECF registrants:
5

6 Teresa Kay Anderson
7 Snell & Wilmer LLP
8 One Arizona Center
9 400 East Van Buren
10 Phoenix, AZ 85004

11 Michael Kent Dana
12 Snell & Wilmer LLP
13 One Arizona Center
14 400 East Van Buren
15 Phoenix, AZ 85004

16 Attorneys for Defendants Robert Russo,
17 QED Media Group, LLC and Internet
18 Defamation League

19 With a COPY of the foregoing emailed on the 14th day of June, 2007, to:

20 William "Bill" Stanley
21 defamationaction@gmail.com
22 geographicalseo@gmail.com

23 With a COPY of the foregoing hand delivered on the 15th day of June, 2007, to:

24 Honorable Neil V Wake
25 United States District Court
26 District of Arizona

27 s/Debra Gower
28 _____

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