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 12 (602) 248-1000
 13 *Attorneys for Plaintiffs*

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF ARIZONA**

12 XCENTRIC VENTURES, LLC, an Arizona
 13 corporation, d/b/a "RIPOFFREPORT.COM";
 14 ED MAGEDSON, an individual

Case No: 07-954-PHX-NVW

14 Plaintiffs,

15 v.

**NOTICE OF CONTINUING
 VIOLATION OF PRELIMINARY
 INJUNCTION DATED JUNE 21, 2007**

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

Defendants.

JABURG & WILK, P.C.
 ATTORNEYS AT LAW
 3200 NORTH CENTRAL AVENUE
 SUITE 2000
 PHOENIX, ARIZONA 85012

1 Plaintiffs Xcentric Ventures, LLC and Ed Magedson (collectively, “Plaintiffs”),
2 hereby serve Notice of the following actions of Defendants William Stanley and Robert
3 Russo in continuing violation of the Preliminary Injunction of this Court dated June 21,
4 2007:

5 A short time after the hearing before this Court on Plaintiffs’ Motion for Contempt,
6 Defendant Robert Russo harassed a participant in Xcentric’s Corporate Advocacy
7 Program. Defendant Russo threatened to ruin the company’s reputation and overwhelm
8 the company with legal expenses because of the company’s participation in the Corporate
9 Advocacy Program.

10 Rick Gelber is the President of the Taylor Wingate Group, a California-based
11 corporation that participates in Xcentric’s Corporate Advocacy Program. During the
12 hearing before this Court on November 1, 2007, counsel for Plaintiffs referenced
13 communications between Rick Gelber and Defendant Russo for the purpose of
14 impeaching statements made by Defendant Russo. As a result of this line of testimony, it
15 was disclosed that the Taylor Wingate Group participates in Xcentric’s Corporate
16 Advocacy Program.

17 Negative postings about the Taylor Wingate Group that had been taken down prior
18 to the hearing have since re-appeared on websites owned by Defendant William Stanley.
19 The threats made by Defendant Russo against the Taylor Wingate Group are more
20 specifically described in the Declaration of Rick Gelber, attached hereto as Exhibit “A”.

21
22 DATED this 14th day of November, 2007.

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

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25
26 s/Laura Rogal
27 Kraig J. Marton
28 Maria Crimi Speth
Adam S. Kunz
Laura Rogal
Attorneys for Plaintiffs

1 **Certificate of Service**

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

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

7 Michael Kent Dana
8 Snell & Wilmer LLP
9 400 E Van Buren
10 Phoenix, AZ 85004-0001

10 With a COPY of the foregoing emailed on the 14th day of November, 2007, to:

11 William "Bill" Stanley
12 videowebsites@yahoo.com

13 With a COPY of the foregoing hand-delivered on the 14th day of November, 2007, to:

14 Honorable Neil V Wake
15 United States District Court
16 District of Arizona

17 s/Debbie Gower
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