

1 Maria Crimi Speth, #012574  
**JABURG & WILK, P.C.**  
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 4 Attorneys for Plaintiffs

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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  
 12 corporation, d/b/a "RIPOFFREPORT.COM";  
 ED MAGEDSON, an individual

Case No: 07-954

13 Plaintiffs,

**REPLY IN SUPPORT OF  
 PROPOSED PRELIMINARY  
 INJUNCTION**

14 v.

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

26 Defendants.

JABURG & WILK, P.C.  
 ATTORNEYS AT LAW  
 3200 NORTH CENTRAL AVENUE  
 SUITE 2000  
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1 Plaintiffs hereby reply in support of its form of Proposed Preliminary Injunction.  
2 Defendant Russo objects to the proposed injunction related to ROR customers.  
3 Plaintiffs have no objection to the Order defining customer, although Plaintiff believes  
4 that it is clear that the definition does NOT mean the users of the ripoffreport.com website  
5 who have posted information. Because the website permits posting of reports and  
6 rebuttals for free, those who use the website for free would not be considered customers.  
7 Rather, as set forth in dictionary.com, a customer is “a person who purchases goods or  
8 services from another; buyer; patron.” Plaintiffs intended for the term to be used in its  
9 ordinary sense. Plaintiff only has a handful of customers (those who pay for services) and  
10 Defendants are aware of who they are as Defendants sent a mass email to Plaintiff’s  
11 customers on February 20, 2007.

12 Defendant Russo also takes the position that he has no control over and can not  
13 remove the content of the websites mentioned in the proposed form of injunction.  
14 Defendant Stanley sent undersigned counsel an email attempting to convince Plaintiffs  
15 and the Court that he will not comply with the Court order and that Russo can not make  
16 him comply. Yet, his website (Hearing Exhibit 38) indicates that “Speth” only named  
17 Russo to get to him.

18 This Court has already ruled that sufficient evidence exists to link Defendant Russo  
19 and Defendant Stanley. Defendant Russo, under penalty of perjury, has submitted an  
20 additional declaration that contains numerous assertions that are directly contrary to the  
21 evidence previously introduced. Additional evidence has since been identified that  
22 unequivocally proves that QED Media owns the Interactive Video Systems website that  
23 the Stanley website IP addresses link to. The common goal of their scheme has been to  
24 decrease the search engine placement of Rip-off Report web pages and there is now proof  
25 that Russo and QED Media charge third parties up to \$1,500 per month for this service.

26 There is sufficient evidence for this Court to find that Defendants Stanley and  
27 Russo are acting in concert and that Stanley, who has made himself difficult to find and  
28 judgment proof, takes credit for all of the bad acts, while Russo and QED Media benefit

1 financially and collect income from Stanley's "services." Defendant Russo's defense in  
2 this case will be that he can not control Stanley, while Stanley boldly vows to violate any  
3 Court order. The Court should not permit this gamesmanship.

4 Accordingly, Plaintiffs respectfully request that the Court reject Defendants  
5 changes to the proposed injunction and enter the injunction as submitted by Plaintiffs.

6 DATED this 24<sup>th</sup> day of May, 2007

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

9  
10 s/ Maria Crimi Speth  
11 Maria Crimi Speth  
12 Attorneys for Plaintiffs

13  
14 **Certificate of Service**

15 I hereby certify that on May 24, 2007, I electronically transmitted the attached  
16 document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of  
17 a Notice of Electronic Filing to the following CM/ECF registrants:

18 Teresa Kay Anderson  
19 Snell & Wilmer LLP  
20 One Arizona Center  
21 400 E Van Buren  
22 Phoenix, AZ 85004

23 Michael Kent Dana  
24 Snell & Wilmer LLP  
25 400 E Van Buren  
26 Phoenix, AZ 85004-0001

27 Attorneys for Defendants Robert Russo,  
28 QED Media Group, LLC and Internet  
Defamation League

With a COPY of the foregoing emailed on the 24<sup>th</sup> day of May, 2007, to:

William "Bill" Stanley  
[defamationaction@gmail.com](mailto:defamationaction@gmail.com)  
[geographicalseo@gmail.com](mailto:geographicalseo@gmail.com)

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With a COPY of the foregoing hand delivered on the 25th day of May, 2007, to:

Honorable Neil V Wake  
United States District Court  
District of Arizona

s/Debra Gower

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