

EXHIBIT A

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PHOENIX, ARIZONA 85012

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

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

Plaintiffs,

v.

WILLIAM "BILL" STANLEY, an
individual; WILLIAM "BILL" STANLEY
d/b/a DEFAMATION ACTION.COM;
WILLIAM "BILL" STANLEY d/b/a
COMPLAINTREMOVER.COM;
WILLIAM "BILL" STANLEY aka JIM
RICKSON; WILLIAM "BILL" STANLEY
aka MATT JOHNSON; ROBERT RUSSO,
an individual; ROBERT RUSSO d/b/a
COMPLAINTREMOVER.COM;
ROBERT RUSSO d/b/a
DEFENDMYNAME.COM; ROBERT
RUSSO d/b/a QED MEDIA 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.

Case No:

**TEMPORARY RESTRAINING
ORDER AND ORDER SETTING
PRELIMINARY INJUNCTION
HEARING**

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Before this Court is Plaintiff Xcentric Ventures, LLC, an Arizona corporation, d/b/a (“Xcentric”) and Ed Magedson’s Application For Temporary Restraining Order With Notice And Application for Preliminary Injunction. The Court having considered the Application, and pleadings on file with the Court, and being otherwise advised, **FINDS** that:

- (1) Defendants have engaged and are continuing to engage in harassment and threats against Plaintiffs;
- (2) Defendants have engaged and are continuing to engage in harassment and threats against Plaintiffs’ internet service providers and, specifically, have threatened that if these service providers continue to serve Plaintiffs, Defendants will put them and their clients out of business;
- (3) Defendants have threatened and harassed businesses who advertise on Plaintiffs’ website threatening them that if they continue to advertise on the website, they will be the subject of “protest” sites which would rank high on search engines;
- (4) Defendants have spammed hundreds of people who work for companies who do business with Xcentric and urged them to stop doing business with Plaintiff, and called their payments for services “extortion payments;”
- (5) Defendants have launched attacks on Plaintiffs’ law firm, posting hate sites and stating that Plaintiffs’ attorneys are unethical, extortionists, and “partners in slime” with Plaintiff Magedson and threatening that such activity will continue;
- (6) Absent a court order, this conduct will continue;
- (7) There is a strong likelihood of success on the merits;

- 1 (8) There is a likelihood of irreparable injury to Plaintiff if this Order is not
2 entered;
- 3 (9) A balance of hardships strongly favors Plaintiff and
- 4 (10) Public policy favors the injunction.
- 5

6 It is therefore **ORDERED** that the **APPLICATION** for a Temporary Restraining
7 Order is **GRANTED** and Defendants and their officers, agents, employees, independent
8 contractors, or other persons acting under their supervision and control or at their request
9 are temporarily enjoined from:

- 10 1. Making, hosting, or transmitting false or deceptively
11 misleading descriptions, statements or representations
12 concerning Xcentric, Ed Magedson and/or Rip-off Report;
- 13 2. Making, hosting, or transmitting false or deceptively
14 misleading descriptions, statements or representations
15 concerning Xcentric's, customers, service providers or
16 advertisers;
- 17 3. Sending or causing to be sent any threatening or harassing
18 communications to Xcentric or Ed Magedson;
- 19 4. Sending or causing to be sent any threatening or harassing
20 communications to any company that provides services to
21 Xcentric;
- 22 5. Sending or causing to be sent any threatening or harassing
23 communications to any company that advertises or has
24 advertised on Rip-off Report;
- 25 6. Sending or causing to be sent any threatening or harassing
26 communications to any customer of Xcentric;
- 27 7. Taking any action with the intent to or the result of interfering
28 with Xcentric's business.

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It is further **ORDERED** that Defendants shall take affirmative steps to ensure that all of their officers, agents, members, employees, independent contractors, or other persons acting under their supervision and control or at their request receive a copy of this temporary restraining order and are appropriately advised as to its terms and conditions, and shall file an advice or certification of counsel or other appropriate notice with the Court confirming that this has been completed within thirty (30) days of the date of this order.

It is further **ORDERED** that Defendants shall not delete or destroy any evidence, including but not limited to computer reproduced or saved data or any other form of evidence pertaining to Xcentric, Magedson, or Rip-off Report.

It is further **ORDERED** that Plaintiffs shall post security in the amount of \$500 within ten days of the date of this order.

It is further **ORDERED** that this Order shall expire on _____, 2007, unless within such time, the Order, for good cause shown, is extended, or unless the Parties consent to the Order being extended for a longer period.

IT IS FURTHER **ORDERED** that Defendants appear before the Court on the ____ day of _____, 2007 at _____ a.m./p.m. and show cause why a preliminary injunction should not issue extending the temporary orders set forth above during the pendency of this action.

It is further **ORDERED** that Plaintiffs will provide a copy of this order to each Defendant as soon as possible but not later than _____, 2007.

DATED: _____