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**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**

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

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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;

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- 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. Knowingly sending or causing to be sent any threatening  
11 communications to any company that provides Internet or  
12 hosting services to Xcentric;  
13 2. Knowingly sending or causing to be sent any false or  
14 misleading communications to any company that provides  
15 Internet or hosting services to Xcentric that attempts to  
16 convince that company to discontinue providing hosting or  
17 Internet services to Xcentric;  
18 3. Knowingly sending spam emails disparaging any company  
19 that Defendants know provides services to Xcentric;  
20 4. Knowingly sending or causing to be sent any threatening  
21 communications to any company that advertises or has  
22 advertised on Rip-off Report;  
23 5. Knowingly sending or causing to be sent any threatening  
24 communications to any customer of Xcentric;  
25

26 It is further **ORDERED** that Defendants shall take affirmative steps to ensure that  
27 all of their officers, agents, members, employees, independent contractors, or other  
28 persons acting under their supervision and control or at their request receive a copy of this

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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 May 17, 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 17<sup>th</sup> day of May, 2007, at 1:30 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 May 14, 2007.

DATED: \_\_\_\_\_