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

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

Case No: 2:07-cv-00954-NVW

15 Plaintiffs,

**REPLY IN SUPPORT OF MOTION  
 FOR ORDER TO SHOW CAUSE RE:  
 CONTEMPT**

16 v.

17 WILLIAM “BILL” STANLEY, an  
 18 individual; WILLIAM “BILL” STANLEY  
 19 d/b/a DEFAMATION ACTION.COM;  
 20 WILLIAM “BILL” STANLEY d/b/a  
 21 COMPLAINTREMOVER.COM; WILLIAM  
 22 “BILL” STANLEY aka JIM RICKSON;  
 23 WILLIAM “BILL” STANLEY aka MATT  
 24 JOHNSON; ROBERT RUSSO, an  
 25 individual; ROBERT RUSSO d/b/a  
 26 COMPLAINTREMOVER.COM; ROBERT  
 27 RUSSO d/b/a DEFENDMYNAME.COM;  
 28 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.

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

3 Counterclaimants,

4 v.

5 ED MAGEDSON, an individual,

6 Counterdefendant.  
7

8 Plaintiffs Xcentric Ventures, LLC (“Xcentric”) and Ed Magedson (“Magedson”)  
9 (collectively, “Plaintiffs”) submit the following Reply in Support of their Motion for an  
10 Order that Defendants William Stanley and Robert Russo appear and show cause why  
11 they should not be held in contempt of Court for having failed to fully comply with the  
12 Preliminary Injunction issued by this Court on June 21, 2007. Plaintiffs have provided  
13 ample evidence to the Court that the actions of Defendants William Stanley and Robert  
14 Russo are so intertwined and interrelated that Russo’s actions, as described in the original  
15 Motion for Order To Show Cause Re: Contempt, violate the Preliminary Injunction and  
16 thus warrant a finding of contempt against Defendant Russo.

17 Based on Plaintiffs’ original Motion, on September 6, 2007, this Court granted  
18 Plaintiffs’ Motion and requested that Plaintiffs lodge a proposed form of order to show  
19 cause. *See* Order dated September 6, 2007, Docket No. 66. Despite this Order, on  
20 September 17, 2007, Defendants Robert Russo, QED Media Group, and Internet  
21 Defamation League (collectively, the “QED Defendants”) filed a “Response in Opposition  
22 to Plaintiffs’ Motion For Order To Show Cause Re: Contempt”. Although so styled, it  
23 appears that the true motive of the QED Defendants “Response” is to actually ask for  
24 reconsideration of the Preliminary Injunction. Since the QED Defendants have provided  
25 no justification for doing so, and have attempted to sneak such a procedurally improper  
26 request into an untimely “Response” to a motion that has already been granted, Plaintiffs’  
27 request that this Court deny the QED Defendants’ request to be given an opportunity to  
28 present evidence in support of modifying the Preliminary Injunction.

1           The sole purpose of the hearing should be to require Defendants Stanley and Russo  
2 to show cause why they are not in contempt. The Preliminary Injunction identifies  
3 specific actions that, if participated in, would violate the Preliminary Injunction. These  
4 actions, numbered 1 through 10 in the Preliminary Injunction, apply to all Defendants,  
5 including Robert Russo. Russo has acted in concert with Stanley to disobey the  
6 instructions of the Preliminary Injunction. It should be noted by the Court that whereas  
7 Plaintiffs' original Motion contained twenty exhibits, all evidencing the unquestionable  
8 relationship between Defendants Stanley and Russo, the QED Parties' response contains  
9 zero exhibits. Instead, the QED Parties request that the Court merely rely on a statement  
10 in the pleading, unsupported by any evidence or affidavit, disagreeing with Russo's  
11 involvement in the creation of the prohibited websites. Even if the maintenance of the  
12 websites named in the Preliminary Injunction was the sole basis for finding the  
13 Defendants in contempt, which it is not, the QED Parties are so involved in the control  
14 and direction of Defendant Stanley's activities that a finding of contempt based entirely  
15 on the activities of Stanley necessitates a finding of contempt against the QED Parties as  
16 well.

17           Defendants Stanley and Russo have a long history of sharing and acting on shared  
18 information, sharing computer servers, sharing website content, and using the same  
19 telephone numbers. This past continues on through the present, and, as demonstrated in  
20 the original Motion, consists of actions in direct violation of the Preliminary Injunction. It  
21 is appropriate for the Court to order the Defendants William Stanley and Robert Russo to  
22 show cause why an order of civil contempt should not be issued against them and to  
23 award Plaintiffs their reasonable damages proximately caused by Defendants' contempt of  
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27 . . . .  
28

1 court. Plaintiffs renew their request that the Court set a hearing ordering Defendants  
2 William Stanley and Robert Russo to appear and show cause why they should not be held  
3 in contempt of court.

4 DATED this 27<sup>th</sup> day of September, 2007

5  
6 **JABURG & WILK, P.C.**

7 s/ Maria Crimi Speth  
8 Maria Crimi Speth  
9 Attorneys for Plaintiffs

10 **Certificate of Service**

11 I hereby certify that on September 27, 2007, I electronically transmitted the  
12 attached document to the Clerk's Office using the CM/ECF System for filing, and for  
13 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

14 Teresa Kay Anderson  
15 Snell & Wilmer LLP  
16 One Arizona Center  
17 400 E Van Buren  
18 Phoenix, AZ 85004

19 Michael Kent Dana  
20 Snell & Wilmer LLP  
21 400 E Van Buren  
22 Phoenix, AZ 85004-0001

23 Attorneys for Defendants Robert Russo,  
24 QED Media Group, LLC and Internet  
25 Defamation League

26 With a COPY of the foregoing emailed this 27<sup>th</sup> day of September, 2007, to:

27 William "Bill" Stanley  
28 defamationsaction@gmail.com  
geographicalseo@gmail.com

With a COPY of the foregoing hand delivered the 28<sup>th</sup> day of September, 2007, to:

Honorable Neil V Wake  
United States District Court  
District of Arizona

s/Debra Gower