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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

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

Plaintiffs,

**MOTION TO RESCHEDULE DATE
 FOR CONTEMPT HEARING SET
 FOR NOVEMBER 9, 2007**

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.

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Plaintiffs Xcentric Ventures, LLC and Ed Magedson (collectively, “Plaintiffs”) respectfully request that this Court reschedule the contempt hearing scheduled for November 9, 2007 for a date prior to November 6, 2007. Maria Crimi Speth, primary counsel for Plaintiffs, will be out of the country on the date that the hearing is presently scheduled for, and thus unavailable to participate in the hearing if it continues as scheduled on November 9th. Furthermore, Xcentric is currently experiencing a Distributed Denial of Service (“DDoS”) attack that warrants an earlier hearing.

Attorney Speth will be out of the country from November 6, 2007 through November 20, 2007. While other attorneys in the firm can cover the hearing, Ms. Speth is the most familiar with the case and with the issues that will be addressed at this hearing.

Additionally, on September 13, 2007, the ROR websites came under attack for the second time this year. That attack is still occurring, although the intensity of the activity has tapered off. As the Court may recall, the ROR websites were the subject of a DDoS attack in February, 2007, at the same time that Defendants in this case were most active in attacking Plaintiff. The DDoS attacks from February and the DDoS attacks occurring from September 13, 2007 through the date of this Motion have similar characteristics, including the origin of the bots causing the attacks. Based on the similarities between the two DDoS attacks, and the likelihood of Defendants’ participation in and/or direction of the attacks, the contempt hearing has become an increasingly urgent issue that should be heard sooner, rather than later.

It should be noted that the publication for alternative service will begin to run in *Arizona Capitol Times* on October 5, 2007 and, thus, by November 4, 2007, Mr. Stanley will be served with process in this case.

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1 Based on the foregoing, Plaintiffs respectfully request that the Court reschedule the
2 contempt hearing to a date prior to November 6, 2007. Alternatively, Plaintiffs request
3 that the Court reschedule the contempt hearing for a date after November 21, 2007.

4 DATED this 3rd day of October, 2007.

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

6
7 /Maria Crimi Speth/
8 Maria Crimi Speth
9 Attorneys for Plaintiffs

10 **Certificate of Service**

11 I hereby certify that on October 3, 2007, I electronically transmitted the attached
12 document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of
13 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 With a COPY of the foregoing emailed on this 3rd day of October, 2007, to:

24 William "Bill" Stanley
25 defamationaction@gmail.com
26 geographicalseo@gmail.com

27 With a COPY of the foregoing hand delivered on the 4th day of October, 2007, to:

28 Honorable Neil V Wake
United States District Court
District of Arizona

s/Maria Crimi Speth