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 3200 North Central Avenue, Suite 2000  
 Phoenix, Arizona 85012  
 (602) 248-1000  
*Attorneys for Plaintiffs*

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

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

Case No: 07-954-PHX-NVW

15 Plaintiffs,

**NOTICE OF THREAT EMAILS  
 RECEIVED FROM THE EMAIL  
 ADDRESS  
 "VIDEOWEBSITES@YAHOO.COM"**

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;  
 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.

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

1 Plaintiffs Xcentric Ventures, LLC and Edward Magedson (collectively,  
2 "Plaintiffs"), hereby serves Notice of the following emails received from  
3 "videowebsites@yahoo.com" on November 7-8, 2007, which contain threats of graphic  
4 sexual violence and murder.

5 At the hearing before this Court on November 1, 2007, the Honorable Neil V.  
6 Wake requested that Defendant William Stanley provide the Court with a valid e-mail  
7 address so that he would be able to receive notifications and correspondence pertaining to  
8 the above-referenced action. Defendant Stanley provided the Court with the e-mail  
9 address of "videowebsites@yahoo.com".

10 On November 7, 2007, a legal assistant working with counsel for Plaintiffs emailed  
11 to Stanley at "videowebsites@yahoo.com" a copy of discovery requests propounded on  
12 Defendant Rob Russo.

13 In response to that e-mail, the legal assistant received five (5) separate e-mails from  
14 the address "videowebsites@yahoo.com". The e-mails received by the legal assistant are  
15 attached hereto as Exhibits "A" through "E". The initial threats of graphic sexual  
16 violence and murder are followed by emails that deny responsibility for the threats.

17 DATED this 8th day of November, 2007.  
18

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

20  
21  
22 /Laura Rogal/  
23 Kraig J. Marton  
24 Maria Crimi Speth  
25 Adam S. Kunz  
26 Laura Rogal  
27 Attorneys for Plaintiffs

28 **Certificate of Service**

I hereby certify that on November 8th, 2007, I electronically transmitted the  
attached document to the Clerk's Office using the CM/ECF System for filing, and for  
transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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Teresa Kay Anderson  
Snell & Wilmer LLP  
One Arizona Center  
400 E Van Buren  
Phoenix, AZ 85004

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

With a COPY of the foregoing emailed on the 8th day of November, 2007, to:

William "Bill" Stanley  
[videowebsites@yahoo.com](mailto:videowebsites@yahoo.com)  
[jorybernhard@yahoo.com](mailto:jorybernhard@yahoo.com)

With a COPY of the foregoing hand delivered on the 8th day of November, 2007, to:

Honorable Neil V Wake  
United States District Court  
District of Arizona

s/Janet A. Sauer

# **EXHIBIT A**

**Jan A. Sauer**

---

**From:** William Stanley [videowebsites@yahoo.com]  
**Sent:** Wednesday, November 07, 2007 10:36 PM  
**To:** Jan A. Sauer  
**Subject:** Re: Xcentric v. Stanley, et al

Please Blow me. It is Sick what you have made the USA. I am not proud to be an American. you people should be ashamed. All of you. get a life

**"Jan A. Sauer" <JAS@jaburgwilk.com> wrote:**

Mr. Stanley, attached hereto please Plaintiffs' Non-Uniform Interrogatories and Requests for Admissions to Russo, QED Media and Internet Defamation League and Plaintiff's Request for Production of Documents to Russo, QED Media and Internet Defamation League.

<<Xcentric Stanley RFD Russo.pdf>> <<Xcentric Stanley NUI to Russo.pdf>>

**Jan Sauer**

**Assistant to Gary J. Jaburg, Kelly Brown**

**David Gingras, and Laura A. Rogal**

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<http://mail.yahoo.com>

# **EXHIBIT B**

**Jan A. Sauer**

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**From:** William Stanley [videowebsites@yahoo.com]  
**Sent:** Wednesday, November 07, 2007 10:46 PM  
**To:** Jan A. Sauer  
**Subject:** Re: Xcentric v. Stanley, et al

When this case is over, I promise you I am going to fuck you to death. all my waking time will be spent sticking my dick in your ass. You will spend every waking moment waiting for what I am going to do next. Have a nice fucking day. I am waiting

*"Jan A. Sauer" <JAS@jaburgwilk.com> wrote:*

Mr. Stanley, attached hereto please Plaintiffs' Non-Uniform Interrogatories and Requests for Admissions to Russo, QED Media and Internet Defamation League and Plaintiff's Request for Production of Documents to Russo, QED Media and Internet Defamation League.

<<Xcentric Stanley RFD Russo.pdf>> <<Xcentric Stanley NUI to Russo.pdf>>

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# **EXHIBIT C**



**Jan A. Sauer**

---

**From:** William Stanley [videowebsites@yahoo.com]  
**Sent:** Wednesday, November 07, 2007 10:55 PM  
**To:** Jan A. Sauer  
**Subject:** Re: Xcentric v. Stanley, et al

The last thing on your smug fucking face will be the horror I see in your eyes when you beg for me to stop. :-)

**"Jan A. Sauer" <JAS@jaburgwilk.com> wrote:**

Mr. Stanley, attached hereto please Plaintiffs' Non-Uniform Interrogatories and Requests for Admissions to Russo, QED Media and Internet Defamation League and Plaintiff's Request for Production of Documents to Russo, QED Media and Internet Defamation League.

<<Xcentric Stanley RFD Russo.pdf>> <<Xcentric Stanley NUI to Russo.pdf>>

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# **EXHIBIT D**

**Jan A. Sauer**

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**From:** William Stanley [videowebsites@yahoo.com]  
**Sent:** Thursday, November 08, 2007 6:59 AM  
**To:** Jan A. Sauer  
**Subject:** Re: Xcentric v. Stanley, et al

Please do not send email to this account. It has been hacked by amit tawari who I beleive is working for Magedson. If you need to send information by email use the email address I gave when I called your office.

Thanks  
Bill

*"Jan A. Sauer" <JAS@jaburgwilk.com> wrote:*

Mr. Stanley, attached hereto please Plaintiffs' Non-Uniform Interrogatories and Requests for Admissions to Russo, QED Media and Internet Defamation League and Plaintiff's Request for Production of Documents to Russo, QED Media and Internet Defamation League.

<<Xcentric Stanley RFD Russo.pdf>> <<Xcentric Stanley NUI to Russo.pdf>>

**Jan Sauer**

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# **EXHIBIT E**

**Jan A. Sauer**

---

**From:** William Stanley [videowebsites@yahoo.com]  
**Sent:** Thursday, November 08, 2007 7:05 AM  
**To:** Jan A. Sauer  
**Subject:** emails

I have just seen the emails sent to your company and also my girlfriend. I am not the author of those emails. Those are sent by Amit tawari who has access to this account.

---

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Tired of spam? Yahoo! Mail has the best spam protection around  
<http://mail.yahoo.com>