UNITED STATES DISTRICT COUP

**DISTRICT OF ARIZONA** 

FILED LODGED RECEIVED \_\_\_COPY OCT 1 2 2010 CLERK US DISTRICT COURT M DEPUTY

XCENTRIC VENTURES, LLC, an Arizona Limited Liability Corporation And JABURG & WILK, P.C., a **Professional Corporation** (Plaintiffs)

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Shawn Richeson (Defendant, Pro. Se.)

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**DEFENDANTS RESPONSE** TO PLAINTIFF'S MOTION TO SHOW CAUSE RE: CONTEMPT

## **DEFENDANTS RESPONSE**

Come now the Defendant in this cause of action does respectfully move for an order denying the Plaintiff's Motion to Show cause and respectfully show's this court as follows:

TO PLAINTIFF'S MOTION TO SHOW CAUSE

- 1) None of the factual assertions in the Defendants email communication with all or any media source are knowingly false, misleading or calculated to interfere with the Plaintiff's businesses.
- 2) Jaburg and Wilk P.C., a local law firm does work in partnership with the website: www.ripoffreport.com and has sued me and is attempting to hide and bury criminal

ORIGINAL

- wrong doings of its members, attorney's partners and clients.
- 3) There are no jaburg and wilk clients listed or displayed on <a href="https://www.Ripoffreport.scom">www.Ripoffreport.scom</a> and paying some one protection money to prevent that action is similar to paying the mafia to keep them from lighting your business on fire or smashing out your windows.
- 4) There is prima facie evidence to suggest that if you irritate or annoy Jaburg & Wilk, P.C. you will in fact end up on their website: www.ripoffreport.com
- 5) Ed Magedson is in fact judgment proof and is a known front man and lightning rod used by Jayburg and Wilk in an attempt to divert criticism away from Jaburg and Wilk P.C. and their protection racket.
- 6) A local private detective in Chandler Arizona was sued by Jaburg and Wilk for the purpose of silencing him and in fact, Jaburg and Wilk applied for an injunction to stop that detective from displaying a very damaging video depicting 3rd party accounts of extortion by Ed Magedson.
- 7) Jaburg and Wilk P.C. is in fact using the judicial process in furtherance of a racketeering scheme and there is ample prima facie evidence to support that fact.

- 8) The Defendant has not knowingly sent or caused to be sent any threatening communications (other than threats to engage in lawful activity) to the Plaintiff's.
- 9) The Defendant has not knowingly published or caused to be published any false or misleading communications about the Plaintiff's and/or any clients and/or potential clients of the Plaintiff's.
- 10) The Defendant has not intentionally interfered with the contractual relationship between the Plaintiff and their clients.
- 11) The Defendant has take affirmative steps to ensure that agents, servants, employees and other persons that act in concert or participation with him receive a copy of the temporary restraining order and are appropriately advised of its terms and conditions.
- 12) The Defendant has not deleted or destroyed any evidence, including but not limited to computer reproduced or saved data or any other form of evidence pertaining to Xcentric, Jaburg and Wilk or their employees or associates.

On Tuesday, September 21<sup>st</sup> 2010 the Defendant was physically present in Phoenix Arizona and agreed to the extension of the temporary restraining order hereinafter called (TRO) and has honored all of the terms and conditions contained therein.

Wherefore, the Defendant humbly prays that this Court deny the Plaintiff's motion to show cause and for any other remedy both equitable and just.

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Respectfully submitted to this honorable Court this Thursday the  $7^{\text{th}}$  day of October 2010.

Defendan

Pro

Shawn A. Richeson 1906 Twilight Drive Killeen, Texas 76543

Shawn@ClickaNerd.com

CERTIFICATE OF SERVICE

ticheson do hereby certify that a true and correct copy of this Defendant's the Plaintiff's motion to show cause was served upon all parties and sthursday the 7th day of October 2010. I, Shawn A. R response to attorneys this

TO: United States District Clerk Sandra Day O'Connor U.S. Courthouse 401 West Washington Street Phoenix, AZ 85003

Please file this in cause of action 10-1931 PHX NVW

## Shawn - Field Manager

From: Shawn - Field Manager [Shawn@ClickaNerd.com]

**Sent:** Friday, October 08, 2010 10:39 AM

To: 'Maria Crimi Speth'
Cc: 'Larry Greenwood'

Subject: Emailing: Microsoft Word - 1-DEFENDANTS-RESPONSE-TO-PLAINTIFFS-MOTION-TO-

SHOW-CAUSE

Attachments: Microsoft Word - 1-DEFENDANTS-RESPONSE-TO-PLAINTIFFS-MOTION-TO-SHOW-

CAUSE.pdf



Microsoft Word - .- DEFENDANTS-..

Dear Maria, Attached is the Defendants response to the Plaintiff's motion to show cause for contempt. I may have already sent you a copy, but I am not sure, I have been fuzzy lately. Take Care

Shawn