

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

JOHN B. THOMPSON,

Plaintiff,

v.

Case No. 07-21256 (Judge Adalberto Jordan)

THE FLORIDA BAR and
DAVA J. TUNIS,

Defendants.

**PLAINTIFF'S REQUEST/MOTION
THAT THE COURT TAKE JUDICIAL NOTICE**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and moves this court to take judicial notice of the following:

All of the "Alabama bar complaints," in addition to their being improperly processed as Florida Bar complaints, are in fact nothing but SLAPP attacks upon Thompson's First Amendment right to oppose the illegal distribution of adult video games to children. This SLAPP assault upon Thompson has nothing to do with "discipline" and everything to do with molesting children. Norm Kent facilitates the on-line distribution of "obscenity" to children and of "indecency" to children on the public airwaves, all in violation of the law, and Take-Two Interactive Software, Inc. distributes adult and Mature-rated games to children. The *Grand Theft Auto* games, responsible for training a teen killer in Alabama how to kill three cops, constitute just the first wave of what Take-Two has in store for America's youth.

If the court had any doubt whatsoever about that, it needs to click on the following link at <http://news.filefront.com/manhunt-2-ps2-and-wii-kill-trailers-bring-on-carnage>. The court is on record saying Thompson need only provide links to material,

not the actual material. Then the court is going to have to personally go to this Internet site at the above link and view the six “trailers” for Take-Two’s *Manhunt 2* game, set to be unleashed upon the world this week, on Halloween.

Manhunt 2 is banned for sale to adults in the UK, Ireland, and Italy, yet it is presently being sold to anyone of any age in the United States via the Internet this moment. It will be sold to American teens in brick and mortar stores this week. Hundreds of millions of dollars are at stake, which is why Blank Rome, the lawyers for Take-Two have been willing to commit perjury to file fraudulent Bar complaints against Thompson, the company’s most abiding, most visible, and most successful critic. The deposition testimony of Alabama’s Judge Moore proves the perjury.

Just so the court understands the likely *criminal* nature of what Take-Two is doing, the court needs to know that the ESRB “descriptor” on *Manhunt 2* states that it contains “*Strong Sexual Content.*” Why is this significant? Because the idiots in the video game industry don’t seem to understand or don’t care to understand that more than forty states, including the federal jurisdiction, have “sexual material harmful to minors” statutes. It is a crime to sell such material to anyone under 18.

The ESRB rating keys its “Mature” rating label to the age of 17, which means that the game is going to be openly sold to kids as young as 17. The problem is that “minor” is defined in this country as someone 18 and over. Thus, the sale of a 17-and-over “Mature-rated” game to someone who is a minor (which a 17 year old, by definition, is) makes the sale of *Manhunt 2* to 17-year-olds at best problematic and most likely criminal, by virtue of the admitted “strong sexual content.”

I HEREBY CERTIFY that this has been served upon record counsel this 28th
day of October, 2007, electronically.

/s/ JOHN B. THOMPSON, Plaintiff
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