



¶	Plaintiff's Additional Fact(s)	Defendants' Response
7	Because it is a service-based business as opposed to, for example, a manufacturer, GSMIC relies heavily on the good reputation of its business and its sales force to stay competitive.	This fact is not material to any issues raised in Defendants' Motion for Partial Summary Judgment. However, Defendants do not dispute the truth of this statement solely for purposes of the pending motion.
8	GSMIC has been the target of several false and deceptively misleading postings on the websites, <a href="http://www.ripoffreport.com">www.ripoffreport.com</a> and <a href="http://www.badbusinessbureau.com">www.badbusinessbureau.com</a> (the "websites").	This fact is not material to any issues raised in Defendants' Motion for Partial Summary Judgment. However, Defendants do not dispute the truth of this statement solely for purposes of the pending motion.
9	The websites and the postings therein are publicly accessible by anyone with an internet connection.	Uncontested.
10	The false, deceptively misleading, and defamatory statements on the websites, including, but not limited to the posting annexed as Exhibit A and B to Defendants' Statement of Uncontested Facts are, therefore, particularly damaging to GSMIC and affect its ability to obtain and retain customers.	This fact is not material to any issues raised in Defendants' Motion for Partial Summary Judgment. However, Defendants do not dispute the truth of this statement solely for purposes of the pending motion.
11	Defendants attempted to enter into a referral agreement with a law firm here in Chicago, Illinois for an \$800,000 fee.	This fact is not material to any issues raised in Defendants' Motion for Partial Summary Judgment. However, Defendants do not dispute the truth of this statement solely for purposes of the pending motion.
12	Via the websites, Defendants solicit non-tax deductible donations, sell books such as the "Ripoff Revenge Guide," advertise for various companies, and solicit various individuals and attorneys to prosecute class action lawsuits against companies.	This fact is not material to any issues raised in Defendants' Motion for Partial Summary Judgment. However, Defendants do not dispute the truth of this statement solely for purposes of the pending motion.



