

PARTIES¹

3. JSB LAW PC (“JSB”) is an Illinois professional corporation with its principal place of business in McHenry County, Illinois.

4. JUDITH BETHGE is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

5. ROY BETHGE is a citizen of the State of Illinois and a resident of McHenry County, Illinois.

6. JOHN LAMBERTO is an individual who, upon information and belief, is a citizen and resident of Iowa.

7. WEST PUBLISHING CORPORATION is a Minnesota corporation with its principal place of business at 380 Jackson Street, #700, St. Paul Minnesota 55101. WEST PUBLISHING CORPORATION dba FINDLAW (“Defendant FindLaw”) is an assumed name through which WEST PUBLISHING CORPORATION does business and operates from its principal place of business at 610 Opperman Drive, Eagan, Minnesota 55123.

8. JOHN LAMBERTO is an employee of Defendant FindLaw.

JURISDICTION AND VENUE

9. The Court has jurisdiction over Plaintiffs’ claims based upon diversity of the parties and pursuant to 28 U.S.C. § 1332. Plaintiffs are citizens of Illinois; Defendant Lamberto is a citizen of Iowa and Defendant FindLaw is a corporation in Minnesota with its principal place of business in Minnesota.

10. There is an actual case or controversy that has arisen between the Plaintiffs and Defendants (“Parties”) in an amount exceeding \$75,000.00.

¹ Defendants that had been named in the original Complaint and that have been omitted here have been dismissed without prejudice.

11. Venue in this district is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to the claim occurred in this district. Further, the Defendants directed their conduct toward the Plaintiffs in this district.

12. Defendants have engaged in intentional conduct with actual malice that has harmed Plaintiffs.

13. Plaintiffs have been injured by Defendants' conduct and have suffered damages resulting therefrom.

FACTUAL BACKGROUND

Background on Parties

14. This action involves the Defendants' efforts to harm the Plaintiffs and to discredit, disparage, and damage the Plaintiffs' professional and business reputations for purposes of (a) retaliating against the Plaintiffs for having declined services offered by the Defendants and (b) causing the Plaintiffs to purchase services from the Defendants.

15. Plaintiff JSB is a law firm that practices criminal and family law.

16. Plaintiff Judith Bethge is JSB's principal attorney and a former assistant state's attorney.

17. Plaintiff Roy Bethge is JSB's office manager and a police officer.

18. Plaintiffs Roy and Judith Bethge are husband and wife.

19. Plaintiffs JSB and Judith Bethge have built a reputation for providing high quality legal representation to clients in McHenry County and neighboring counties.

20. Plaintiff Roy Bethge has built a reputation as a highly respected police officer, instructor, and trainer, as well as a leader and role model in community programs.

21. Defendant John Lamberto ("Lamberto") is a sales consultant for FindLaw.

22. Defendant FindLaw offers law firm clients the opportunity to advertise in its directory. It also provides website and other marketing services to law firms.

23. Defendant FindLaw is an assumed name for West Publishing Corporation.

Relationship Between the Parties

24. In 2009, Defendant Lamberto, in his capacity as sales consultant for Defendant FindLaw, attempted to sell Plaintiffs marketing services, including a website, from FindLaw.

25. Due to financial circumstances and the challenges of starting a small law firm, Plaintiffs declined Defendant Lamberto's efforts.

26. Thereafter, Defendant Lamberto attempted repeatedly to convince Plaintiffs Roy and Judith Bethge to purchase Defendant FindLaw's services, but Plaintiffs continued to decline.

27. On behalf of the Plaintiffs, Roy Bethge formally declined the sales offer on October 5, 2009.

Defamatory Statement

28. On or about October 5, 2009, Defendant Lamberto pseudonymously published a fraudulent review of Plaintiffs on the Google Maps website operated by Google, Inc, maps.google.com, using the pseudonym "crisvernon" (a copy has been attached as "Exhibit A").

29. In the fraudulent review, Defendant Lamberto stated that Plaintiff JSB has an attorney with "a drunken cop husband running the firm."

30. Plaintiff Roy Bethge is not a "drunken cop husband" or an alcoholic. He has never worked in an inebriated or "drunken" state of mind for Plaintiff JSB or, for that matter, as a police officer.

31. Plaintiff JSB does not have "a drunken cop husband running the firm."

32. Consequently, the statement made by Defendant Lamberto on the fraudulent

review is false (“False and Defamatory Statement”).

33. Defendant Lamberto targeted Plaintiffs specifically when he published the False and Defamatory Statement.

34. Defendant Lamberto made the False and Defamatory Statement with the reasonable expectation that prospective clients who read the review would not choose services provided by Plaintiffs JSB and Judith Bethge.

35. Defendant Lamberto knowingly made the False and Defamatory Statement because he knew the Google Map’s review would prevent Plaintiffs JSB and Judith Bethge from securing new clients.

36. Defendant Lamberto made the False and Defamatory Statement in the course of securing sales for Defendant FindLaw. Specifically, he made the False and Defamatory Statement for purposes of causing the Plaintiffs to purchase services from Defendant FindLaw as well as to retaliate for Plaintiffs’ failure to purchase services from him and Defendant FindLaw.

37. Defendant Lamberto made the False and Defamatory Statement in the scope of his employment with Defendant FindLaw.

38. Ironically, the Plaintiffs changed their mind and agreed to purchase the services from Defendant FindLaw before learning of the False and Defamatory Statement.

39. Upon information and belief, Defendant Lamberto published other false reviews on the Internet.

40. Upon information and belief, Defendant Lamberto published other fraudulent reviews on the Internet containing positive comments for law firms that purchased products from Defendant FindLaw through him.

Public Perception

41. The False and Defamatory Statement conveys that Plaintiff JSB is poorly managed by an alcoholic unable to responsibly handle the operations, accounts, finances, and obligations of a law firm.

42. The False and Defamatory Statement conveys that Plaintiff Judith Bethge exercises poor judgment as an attorney by employing a drunken office manager, and that she is unable to responsibly carry out her fiduciary duties and obligations to her clients, the courts, her colleagues, and the community.

43. The False and Defamatory Statement conveys that Plaintiff Roy Bethge is an alcoholic unable to responsibly manage a law office, serve and protect the community as a police officer, and/or serve as a leader and role model in community programs.

44. Since the publication of the False and Defamatory Statement, any individual reading the review might believe that Plaintiffs Judith and Roy Bethge lack the integrity or ability to perform in the discharge of their duties in their office or employment.

45. Since the publication of the False and Defamatory Statement, any individual reading the review might believe that Plaintiffs Judith and Roy Bethge lack ability in their trade, profession, or business.

46. The Plaintiffs remain concerned that individuals and organizations, including prospective clients, will choose not to utilize their services based upon the False and Defamatory Statement.

47. Indeed, Plaintiff Roy Bethge remains concerned that the False and Defamatory Statement will affect his advancement in the police department for which he works.

Intent and Actual Malice

48. Defendant Lamberto acted with intent and actual malice because he intended to harm the Plaintiffs.

49. Defendant Lamberto acted with the intent to tortiously interfere with the Plaintiff JSB's business interests by dissuading prospective parties, who read the Google Map's review, from becoming JSB's clients.

Respondeat Superior

50. Defendant Lamberto acted within the scope of his employment with Defendant FindLaw when he published the False and Defamatory Statement.

51. Defendant Lamberto published the False and Defamatory Statement on or about the same day Plaintiffs Roy and Judith Bethge officially declined Lamberto's offer.

52. Defendant Lamberto published the False and Defamatory Statement in response to Plaintiffs declining to purchase Defendant FindLaw's products and services from him.

53. By publishing the False and Defamatory Statement, Defendant Lamberto meant, at least in part, to serve his employer and Defendant FindLaw by encouraging the Plaintiffs to reconsider their decision not to purchase Defendant FindLaw's products and services from him.

54. Indeed, the Defendants' products and services, particularly those offered through Defendant FindLaw, could help counteract the negative publicity generated from Defendant Lamberto's False and Defamatory Statement on Google Maps.

55. Upon information and belief, Defendant Lamberto has rewarded those clients purchasing Defendant FindLaw's products from him with fraudulent positive reviews.

56. Defendant FindLaw is responsible for the conduct of John Lamberto relating to his relationship with their potential and existing customers, particularly the Plaintiffs.

The Harm Suffered By Plaintiffs

57. The foregoing wrongful conduct on the part of the Defendants (“Wrongful Conduct”) has caused Plaintiffs to suffer harm including, but not limited to, harmed reputations.

58. As a result of the False and Defamatory Statement and Wrongful Conduct, the Plaintiffs have suffered a loss of reputation and business.

59. The False and Defamatory Statement has proximately caused Plaintiffs to suffer damages.

60. Plaintiffs’ damages include, but are not limited to, a decline in prospective business.

61. Plaintiffs’ damages also include, but are not limited to, a decline in the prospective business promised by the Defendants that otherwise would have arisen from the website purchased from Defendants but for the False and Defamatory Statement.

62. The Defendants have caused Plaintiffs to suffer harms not yet fully realized.

Plaintiffs Need Injunctive Relief

63. Although the Plaintiffs seek compensatory and punitive damages, the Plaintiffs have an inadequate remedy at law, and, consequently need injunctive relief.

64. Plaintiffs have suffered and will continue to suffer irreparable harm if this Court does not enjoin Defendants because Plaintiffs’ livelihoods, offices, professions, and business, will be disrupted if Defendants continue to engage in the Wrongful Conduct.

65. Plaintiffs will suffer irreparable harm in the absence injunctive relief. In contrast, Defendants will suffer no harm because they have no legal right to engage in deceptive and unlawful practices.

66. Plaintiffs can clearly demonstrate some likelihood of success on the merits of their claims.

67. Mere compensation at law can only possibly provide Plaintiffs with compensation for injuries up to the present.

68. It remains difficult if not impossible to calculate the damages arising from the Defendants' Wrongful Conduct.

69. The public interest will not be harmed if an injunction is granted.

CLAIMS FOR RELIEF

COUNT ONE

AS AND FOR A FIRST CAUSE OF ACTION

DEFAMATION *PER SE* OF PLAINTIFF JSB AND JUDITH BETHGE

70. The allegations in Paragraphs 1 through 69 above are incorporated by reference in this Count One as if fully restated herein.

71. Defendant Lamberto falsely stated that a “drunken cop husband” ran Plaintiff JSB’s office.

72. Defendant Lamberto published the False and Defamatory Statement concerning Plaintiffs to third parties.

73. By making this statement on maps.google.com, Defendant Lamberto caused the False and Defamatory Statement to be made on and through the Internet.

74. The False and Defamatory Statement identified Plaintiff JSB by name.

75. Persons other than Plaintiffs and the Defendants would have and actually have reasonably understood that the False and Defamatory Statement related to and was about each of the Plaintiffs.

76. The False and Defamatory Statement conveys that Plaintiff JSB is poorly managed by an alcoholic unable to responsibly handle the operations, accounts, finances, and obligations of a law firm.

77. The False and Defamatory Statement conveys that Plaintiff Judith Bethge exercises poor judgment as an attorney by employing a drunken office manager, and that she is unable to responsibly carry out her fiduciary duties and obligations to her clients, the courts, her colleagues, and the community.

78. The False and Defamatory Statement imputes a lack of integrity and an inability to perform the duties of Plaintiffs JSB and Judith Bethge in their office and employment as a law practice and an attorney providing legal representation to the community.

79. The False and Defamatory Statement prejudices Plaintiffs JSB and Judith Bethge and imputes a lack of ability in their profession and business as a law practice and an attorney providing legal representation to the community.

80. Defendant Lamberto presented the False and Defamatory Statement as fact.

81. The False and Defamatory Statement constituted unprivileged publication of the defamatory statement by Defendant Lamberto to third parties.

82. Defendant Lamberto made the False and Defamatory Statement with actual malice knowing the falsity of the statement.

83. Defendant Lamberto made the False and Defamatory Statement within the scope of his employment with Defendant FindLaw.

84. Defendant Lamberto made the False and Defamatory Statement, at least in part, to serve his employer, Defendant FindLaw, by encouraging the Plaintiffs to reconsider and purchase Defendant FindLaw's services.

85. Indeed, Defendant FindLaw's products and services could help counteract the negative publicity generated from Defendant Lamberto's False and Defamatory Statement on Google Maps.

86. The False and Defamatory Statement constitutes defamation *per se* because it falsely imputes a lack of integrity and an inability to perform the duties of Plaintiffs JSB and Judith Bethge in their employment as a law practice and an attorney, and prejudices the Plaintiffs and imputes a lack of ability in their profession and business as a law practice and an attorney.

87. As a result of the Defendants' conduct and the publication of the False and Defamatory Statement, the Plaintiffs have suffered and continue to suffer damages including, but not limited to, loss of business and harmed reputation.

88. WHEREFORE, Plaintiffs JSB and Judith Bethge seek recovery of compensatory and punitive damages arising from Defendants' *per se* defamation of them.

89. WHEREFORE, Plaintiffs JSB and Judith Bethge seek injunctive relief in the form of an order (a) compelling Defendants to remove the False and Defamatory Statement from the Internet and (b) enjoining Defendants from impersonating or pretending to be a client or colleague of the Plaintiffs, interfering with Plaintiffs' law practice, and maligning Plaintiffs' professional and business reputations.

COUNT TWO

AS AND FOR A SECOND CAUSE OF ACTION

DEFAMATION *PER SE* OF ROY BETHGE

90. The allegations in Paragraphs 1 through 69 above are incorporated by reference in this Count Two as if fully restated herein.

91. Defendant Lamberto falsely stated that a "drunken cop husband" runs the Plaintiffs' law office.

92. Defendant Lamberto published this False and Defamatory Statement concerning Plaintiffs to third parties.

93. By making this statement on maps.google.com, Defendant Lamberto caused the False and Defamatory Statement to be made on and through the Internet.

94. Persons other than Plaintiffs and the Defendants would have and actually have reasonably understood that the False and Defamatory Statement related to and was about Plaintiff Roy Bethge.

95. The False and Defamatory Statement conveys that Plaintiff Roy Bethge is an alcoholic unable to responsibly manage a law office, serve and protect the community as a police officer, and serve as a leader and role model in community programs.

96. The False and Defamatory Statement imputes a lack of integrity and an inability of Plaintiff Roy Bethge's to perform the duties of employment as an office manager, a police officer, and a leader and role model in community programs.

97. The False and Defamatory Statement prejudices Plaintiff Roy Bethge and imputes a lack of ability in his profession and business as an office manager, a police officer, and a leader and role model in community programs.

98. Defendant Lamberto presented the False and Defamatory Statement as fact.

99. The False and Defamatory Statement constituted unprivileged publication of the defamatory statement by Defendant Lamberto to third parties.

100. Defendant Lamberto made the False and Defamatory Statement with actual malice knowing the falsity of the statement.

101. Defendant Lamberto made the False and Defamatory Statement within the scope of his employment with Defendant FindLaw.

102. Defendant Lamberto made the False and Defamatory Statement, at least in part, to serve his employer, Defendant FindLaw, by encouraging the Plaintiffs to reconsider and purchase Defendant FindLaw's services.

103. Indeed, the Defendant FindLaw's products and services could help counteract the negative publicity generated from Defendant Lamberto's False and Defamatory Statement on Google Maps.

104. Based on the forgoing, the False and Defamatory Statement constitutes defamation *per se*.

105. As a result of the Defendants' conduct and the publication of the False and Defamatory Statement, Plaintiff Roy Bethge has suffered and continues to suffer damages including, but not limited to, harmed reputation.

106. WHEREFORE, Plaintiff Roy Bethge seeks recovery of compensatory and punitive damages arising from Defendants' *per se* defamation of him.

107. WHEREFORE, Plaintiff Roy Bethge seeks injunctive relief in the form of an order (a) compelling Defendants to remove the False and Defamatory Statement from the Internet and (b) enjoining Defendants from impersonating or pretending to be a client or colleague of the Plaintiffs, interfering with Plaintiffs' law practice, and maligning Plaintiffs' professional and business reputations.

COUNT THREE

AS AND FOR A THIRD CAUSE OF ACTION

TRADE DISPARAGEMENT OF PLAINTIFF JSB

ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT

815 ILCS § 510/2

108. The allegations in Paragraphs 1 through 69, 71 through 87, and 91 through 105, above are incorporated by reference in this Count Three as if fully restated herein.

109. The False and Defamatory Statement states that a “drunken cop” runs Plaintiff JSB’s office.

110. The False and Defamatory Statement is untrue.

111. The False and Defamatory Statement constitutes a false representation of fact.

112. The False and Defamatory Statement disparages Plaintiff JSB’s business and services.

113. Defendant Lamberto presented the False and Defamatory Statement as fact.

114. Defendant Lamberto made the False and Defamatory Statement with actual malice, knowing the falsity of the statement.

115. Defendant Lamberto willfully made the False and Defamatory Statement.

116. Defendant Lamberto made the False and Defamatory Statement within the scope of his employment with Defendant FindLaw.

117. Defendant Lamberto made the False and Defamatory Statement, at least in part, to serve his employer, Defendant FindLaw, by encouraging the Plaintiffs to reconsider and purchase Defendant FindLaw’s services.

118. Indeed, Defendant FindLaw’s products and services could help counteract the negative publicity generated from Defendant Lamberto’s False and Defamatory Statement on Google Maps.

119. As a result of the Defendants’ conduct and the publication of the False and Defamatory Statement, Plaintiff JSB has suffered and continues to suffer damages including, but not limited to, loss of business and harmed reputation.

120. WHEREFORE, Plaintiff JSB seeks recovery of compensatory and punitive damages arising from Defendants’ disparagement of its business and services.

121. WHEREFORE, Plaintiff JSB seeks, upon a finding that Defendant Lamberto acted willfully, recovery of attorney's fees and costs arising from Defendants' disparagement of its business and services.

122. WHEREFORE, Plaintiff JSB seeks injunctive relief in the form of an order (a) compelling Defendants to remove the False and Defamatory Statement from the Internet and (b) enjoining Defendants from impersonating or pretending to be a client or colleague of the Plaintiffs, interfering with Plaintiffs' law practice, and maligning Plaintiffs' professional and business reputations.

COUNT FOUR

AS AND FOR A FOURTH CAUSE OF ACTION

TORTIOUS INTERFERENCE WITH

PLAINTIFFS' PROSPECTIVE ECONOMIC ADVANTAGE

123. The allegations in Paragraphs 1 through 69, 71 through 87, 91 through 105, and 109 through 119, above are incorporated by reference in this Count Four as if fully restated herein.

124. Plaintiffs held a reasonable expectancy of entering into valid business relationships with consumers who would find them through the Internet.

125. Indeed, Defendant FindLaw informed the Plaintiffs that its products would produce a certain number of prospective business clients through the Internet.

126. Consequently, the Defendants had knowledge of the Plaintiffs' expectancy of entering into valid business relationships with consumers who would find them through the Internet.

127. Defendant Lamberto falsely stated a “drunken cop husband” runs Plaintiff JSB’s office.

128. The False and Defamatory Statement identifies Plaintiff JSB by name.

129. Defendant Lamberto presented the False and Defamatory Statement as fact.

130. Defendant Lamberto made the False and Defamatory Statement with the reasonable expectation that prospective clients who read the review would not choose the Plaintiffs’ services.

131. Defendant Lamberto knowingly made the False and Defamatory Statement because Plaintiffs would expect the Google Map’s review to prevent the Plaintiffs from securing new clients.

132. Defendant Lamberto acted with the intent to tortiously interfere with the Plaintiffs’ business interests by dissuading prospective parties, who read the Google Map’s review, from becoming JSB’s clients.

133. The publication of the False and Defamatory Statement constitutes an intentional and unjustifiable interference with prospective clients of the Plaintiffs that would find them through the Internet.

134. The publication of the False and Defamatory Statement caused prospective consumers to refrain from contacting and/or doing business with the Plaintiffs.

135. As a result of the Defendants’ conduct and the publication of the False and Defamatory Statement, Plaintiffs have suffered and continue to suffer damages including, but not limited to, loss of prospective business.

136. Defendant Lamberto made the False and Defamatory Statement within the scope of his employment with Defendant FindLaw.

137. Defendant Lamberto made the False and Defamatory Statement, at least in part, to serve his employer, Defendant FindLaw, by encouraging the Plaintiffs to reconsider and purchase Defendant FindLaw's services.

138. Indeed, Defendant FindLaw's products and services could help counteract the negative publicity generated from Defendant Lamberto's False and Defamatory Statement on Google Maps.

139. WHEREFORE, Plaintiffs seek recovery of compensatory and punitive damages arising from Defendants' tortious interference with their prospective economic advantage.

140. WHEREFORE, Plaintiffs seek injunctive relief in the form of an order (a) compelling Defendants to remove the False and Defamatory Statement from the Internet and (b) enjoining Defendants from impersonating or pretending to be a client or colleague of the Plaintiffs, interfering with Plaintiffs' law practice, and maligning Plaintiffs' professional and business reputations.

COUNT FIVE

AS AND FOR A FIFTH CAUSE OF ACTION

FALSE LIGHT OF ROY AND JUDITH BETHGE

141. The allegations in Paragraphs 1 through 69, 71 through 87, 91 through 105, above are incorporated by reference in this Count Five as if fully restated herein.

142. Defendant Lamberto published the False and Defamatory Statement on the Internet through Google.

143. Defendant Lamberto falsely stated that a "drunken cop husband" runs Plaintiff JSB's office by publishing the False and Defamatory Statement.

144. The False and Defamatory Statement identifies Plaintiff JSB by name.

145. The False and Defamatory Statement portrays Plaintiff Roy Bethge in a false light by stating he is a “drunken cop.”

146. The False and Defamatory Statement portrays Plaintiff Judith Bethge in a false light by stating her firm is run by a “drunken cop.”

147. Defendant Lamberto made the False and Defamatory Statement with actual malice, knowing the falsity of the statement.

148. Defendant Lamberto made the False and Defamatory Statement within the scope of his employment with Defendant FindLaw.

149. Defendant Lamberto made the False and Defamatory Statement, at least in part, to serve his employer, Defendant FindLaw, by encouraging the Plaintiffs to reconsider and purchase Defendant FindLaw’s services.

150. Indeed, Defendant FindLaw’s products and services, particularly those offered through FindLaw, could help counteract the negative publicity generated from Defendant Lamberto’s False and Defamatory Statement on Google Maps.

151. As a result of the Defendant Lamberto’s conduct and the publication of the False and Defamatory Statement, Plaintiffs Roy and Judith Bethge have suffered and continue to suffer damages including, but not limited to, loss of business and harmed reputation.

152. WHEREFORE, Plaintiffs Roy and Judith Bethge seek recovery of compensatory and punitive damages arising from Defendants’ portrayal of Plaintiffs Roy and Judith Bethge in a false light.

153. WHEREFORE, Plaintiffs Roy and Judith Bethge seek injunctive relief in the form of an order (a) compelling Defendants to remove the False and Defamatory Statement from the Internet and (b) enjoining Defendants from impersonating or pretending to be a client or

colleague of the Plaintiffs, interfering with Plaintiffs' law practice, and maligning Plaintiffs' professional and business reputations.

GENERAL

154. Where conditions precedent are alleged, Plaintiffs aver that all conditions precedent have been performed or have occurred.

155. Plaintiffs demand a jury trial.

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE accordingly and respectfully pray for judgment against DEFENDANTS as follows:

1. That PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE be awarded compensatory damages in an amount to be determined at trial;
2. That PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE be awarded punitive damages in an amount to be determined at trial;
3. That PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE be awarded attorney's fees and costs;
4. That PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE be awarded the injunctive relief sought; and,
5. That PLAINTIFFS JSB LAW PC, JUDITH BETHGE, and ROY BETHGE be awarded any such other and further relief as this Court may deem just and proper or to which they may be entitled as a matter of law or equity.

Dated: Chicago, Illinois

PLAINTIFFS,

December 10, 2010

JSB LAW PC, JUDITH BETHGE, and ROY BETHGE

s/Mark A. Petrolis

By: By One of Their Attorneys

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JSB LAW PC, JUDITH BETHGE, and)	
ROY BETHGE,)	AMENDED COMPLAINT AND
)	JURY DEMAND
Plaintiffs,)	
)	No. 10-cv-06316
v.)	
)	The Hon. John F. Grady
JOHN LAMBERTO and WEST)	
PUBLISHING CORPORATION dba)	
FINDLAW,)	DEMANDS OVER \$75,000
)	
Defendants.)	

JURY DEMAND

Plaintiffs demand trial by jury.

s/Mark A. Petrolis
Mark A. Petrolis