IIN THE UNITED STATES DISTRICT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MEANITH HUON,)
v.		Plaintiff,) CIVIL ACTION NO.: 1: 11-cv-3054
ABOVETHELAW.COM,	et. al.)))
		Defendants)

AMENDED MOTION TO STRIKE EXHIBIT B TO DEFENDANTS' MEMORANDUM

Plaintiff, Meanith Huon, states as follows:

- Defendants, Breaking Media, LLC, Breaking Media, Breakingmedia.com, David Lat, John Lerner, Abovethelaw.com, Elie Mystal, ("The Above the Law" Defendants") filed an exhibit B to its Memorandum of Law in Support of its Motion to Dismiss. Exhibit B to Exhibit 1 of Document No. 36.
- 2. Exhibit "B" appears to be an incomplete transcript of the jury trial in the People of the State of Illinois v. Meanith Huon, 08 CF 1496.
- Exhibit "B" is not relevant and serves no other purpose except to harass and embarrass Mr. Huon.
- 4. For example, the Trial Judge in 08 CF 1496 barred the consent defense, but the incomplete transcript from the first day of trial does not show that. The trial transcript consisting of opening arguments is not even evidence presented at trial.
- 5. Moreover, the Above The Law article was published on or about the day Mr.

Huon was acquitted several days later on May 6, 2010.

- 6. Worse, Exhibit identified the complaining witness in 08 CF 1496 and her hometown. On information and belief, newspapers generally do not identify the complaining witness. The trial transcript also identifies the names and addresses of the witnesses in the case.
- 7. On information and belief, there is no evidence that The Above The Law Defendants even ordered the trial transcript before publishing the defamatory statements. The trial transcript serves no other purpose but to harass and embarrass then individuals involved in the underlying criminal case.
- 8. Defendants could have filed a transcript redacting the names and addresses of the complaining witness and witnesses.
- 9. Mr. Huon agreed to give Defendants leave to file in excess of the page limitations allowed, as a matter of professional courtesy.
- 10. He never agreed to give Defendants leave to file a trial transcript disclosing the names and address of the complaining witness and witnesses in the criminal case.
- 11. Pursuant to Local Rule 37.2, counsel's attempts to engage in such consultation were unsuccessful due to no fault of counsel's. On or about September 22, 2011, Mr. Huon requested in writing that counsel for Defendants produce the entire transcript. Exhibit A. On or about September 30, 2011, Mr. Huon left a message for counsel for Defendants,Shari Albrect, asking for her clients' position on producing the entire trial transcript Counsel for Defendants have not responded.

WHEREFORE, Plaintiff, Meanith Huon, requests that this Honorable Court:

1. Strike Exhibit B to Defendants' Memorandum of Law.

2. In the alternative, order the Clerk of Court to remove Exhibit B and replace a redacted version of Exhibit redacting the names and addresses of the complaining witness and witnesses and any personal information.

Respectfully Submitted,

<u>By: /s/ Meanith Huon /s/</u> Meanith Huon

Meanith Huon ARDC No.: 6230996 PO Box 441 Chicago, IL 60690 312-405-2789 huon.meanith@gmail.com

IN THE UNITED STATES DISTRICT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MEANITH HUON, v.	Plaintiff,)))))))))))))))))))))))))))))))))))))))
FORMER MADISON COU ATTORNEY WILLIAM M)))))

CIVIL ACTION NO. 11-3050 JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

Under penalties of law, I attest the following documents or items have been or are being electronically served on all counsel of record for all parties:

AMENDED MOTION TO STRIKE EXHIBIT B TO DEFENDANTS' MEMORANDUM

Respectfully submitted, /s/ Meanith Huon Meanith Huon PO Box 441 Chicago, Illinois 60690 Phone: (312) 405-2789 E-mail: huon.meanith@gmail.com IL ARDC. No.: 6230996