

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
FOR THE DISTRICT OF MARYLAND
(Northern Division)

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BY _____ AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND DEPUTY

JAMES REDDING *

Plaintiff, *

CIVIL ACTION NO. 1:11-cv-00674-CCB

v. *

JUSTIA, INC., et al *

Defendants. *

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

Plaintiff, James Redding ("Mr. Redding" or "Plaintiff") pro se, respectfully submit this Motion in Opposition to Defendant's Motion to Dismiss. In support thereof, Plaintiff states as follows:

INTRODUCTION

On or about December 27th, 2010, Defendants McCoy and Shelton intentionally interjected their opinions and biases into the processing of Plaintiff's Appellant's Brief, while instructing Plaintiff to correct errors or risk having the appeal dismissed. After several letters from Defendants' McCoy and Shelton regarding errors made by Plaintiff during the construction of Plaintiff's Appellant's Brief, Plaintiff responded by sending a letter to the Virginia Court of Appeals, requesting the dismissal of his appeal.

Defendants intentionally ignored Plaintiff's request and rushed their edited version of Plaintiff's Appellant's Brief to Defendants McClanahan, Haley, and Willis, for an expedited ruling, so that Defendant Justia Inc. could have the opportunity to immediately post the Court's decision to Justia.com's [pay to play] website, in order to take advantage of funds to be received from Internet users interested in purchasing the Court's decision from Justia.com To ensure maximum advertising exposure on the first page of all Internet search engines, Defendant Justia Inc. utilized its business relationship with Google, in order to keep Plaintiff's name only, associated with the Virginia Court of Appeals ruling on Defendants McCoy's and Shelton's edited version of Plaintiff's Appellant's Brief. *Defendant Justia Inc. is well aware that victims of Cyber Bullying would have to pay thousands of dollars to Google and its associates in order to have biased and defamatory information removed from all internet search engines' first pages.*

Defendants McClanahan, Haley, Willis, McCoy, and Shelton, blurred the line between professional legal advocacy and cold-blooded Cyber Bullying for profit, ensuring that financial arrangements between Justia.com, Google and its associate websites and Internet search engines, would profit from the Virginia Court of Appeal's altered version of Plaintiff's medical history. Defendant's McClanahan, Haley, Willis, McCoy, and Shelton engaged in acts of Cyber Bullying against Plaintiff by their refusal to honor Plaintiff's letter to dismiss his appeal with the Virginia Court of Appeals and to remove all information pertaining to the appeal from the Virginia Court of Appeals website, Justia Inc.'s Website, and all internet search engines, including Google's internet search engine. See Exhibit A.

Defendants are mistaken in their opining that Plaintiff's complaint arises from an underlying worker's compensation claim that was denied. In fact, Plaintiff made a written request to the Virginia Court of Appeals, asking that his appeal be dismissed due to written complaints by Defendants McCoy and Shelton concerning errors made by Plaintiff in the construction of his Appellant's Brief. In addition, Plaintiff's complaint arises from underlying retaliatory actions, abuse of authority issues, greed, and alleged business and other relationships [if any] between Defendants and the Virginia based company [Community Living Alternatives]. It has been alleged that between 1995-2001, employees of Community Living Alternatives, many of whom were people of color with limited education and limited employable skills, in addition to foreign nationals with similar educational and employment backgrounds were improperly screens for biological viruses, and were misinformed about the risks associated with viral infections within group homes managed by Community Living Alternatives.

After the Virginia Court of Appeals posted their biased opinions regarding what Plaintiff thought was a dismissed appeal, Plaintiff made a written request to the Virginia Court of Appeals, Justia Inc., and Google, to have the Court's biased decision removed from their websites. Plaintiff's request was ignored so that Justia.com and similar websites could continue to financially thrive from the Virginia Court of Appeals revised and factually flawed version of Plaintiff's medical history.

Within the technology field, there are a strain of techies known as "grave robbers". Grave robberies create websites and build relationships with employees at various courts, morgues, churches, etc. to acquire medical data. Legacy.com and Justia.com are just a few examples of websites that acquire medical data, then sale the data to interested Internet users. Many purchasers of this data are foreign nationals in need of deceased U.S. citizen's identities,

including the deceased individual's social security number and date of birth. Eventually Internet grave robbers will have access to all public and private data specific to medical issues, including the ability to market videotaped autopsies of deceased public and private individuals onto the first pages of all Internet search engines owned by website owners with business relationships specific to Google.

Internet search engines' first page status of medical and other data [factual or fabricated] is routinely reserved for government agencies, corporations, and website owners with business relationships with internet search engines e.g. Google. It is untrue to believe that data posted to the Internet can never be removed. Google and website owners with specific business relationships with Google have the authority and the fee schedule to remove any data posted to the Internet.

If Defendants believe that the underlying reason that Plaintiff filed this complaint arises from the denial of a workers' compensation claim filed fifteen years ago, then Defendants should also be concerned about the Virginia based company [Community Living Alternatives], a company that allegedly misinformed its employees, specifically employees of color, about the risk to their health from biological contaminants within working environments managed by Community Living Alternatives. Many of these employees [if alive] remain unaware of the biological agents that they may have been exposed to during their employment with Community Living Alternatives.

CONCLUSION

Contrary to the belief of Defendants, Plaintiff effected this civil complaint in order to defend himself against Cyber Bullies that use their websites as lethal viruses against their foes, and to financially profit from biased and factually flawed data posted to Internet search engines. On September 6th, 2011, the attorney representing Defendants McCoy, Shelton, and Justia Inc. agreed to attempt to convince his clients to remove all medical data specific to Plaintiff, from their websites, in exchange for a dismissal of Plaintiff's complaint. Plaintiff agreed to the proposal by Attorney John J. Yannone, in addition to agreeing to send a second summons by "restricted delivery" mail to Defendant Justia Inc. In lieu of further action on this case, Plaintiff respectfully request that this Court allow Plaintiff and Defendants to resolve the issues surrounding the removal of all medical data specific to Plaintiff, from Defendants' websites. In the alternative, Plaintiff prays that this Court put into place a permanent restraining order for the removal of all documents relating to Plaintiff, published onto the internet by the Virginia Court of Appeals, Justia Inc., and Google. In addition, Plaintiff request that all funds received directly and indirectly from the sale of Plaintiff's medical information by the Virginia Court of Appeals, Justia Inc., Google, and its affiliates, be transferred to the organizations listed below:

- ✓ St. Jude's Childrens Research Hospital
501 St. Jude Place
Memphis, TN 38105

- ✓ Paralyzed Veterans of America
National Headquarters
801 Eighteenth Street, NW
Washington, DC 20006-3517

Respectfully submitted,

James Redding
P.O. Box 3411
Washington, D.C. 20010
301 887 3084

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of September, 2011, a copy of the foregoing Motion in Opposition to Defendants' Motion to Dismiss, was served by first-class mail, to the following:

John J. Yannone
Resnick & Schwartzman, L.L.C.
One East Franklin Street, Suite 200
Baltimore, Maryland 21202

James Redding