

WILLIAM v. AGUIAR III  
PLAINTIFF

VS.

CIVIL ACTION 07-11673-MLW

FLOYD WEBB AND ALL  
DEFENDANT'S

F I L E D  
Clerk's Office  
USDC, Mass.  
Date 10-31-07  
By KTB  
Deputy Clerk

WILLIAM V. AGUIAR III OPPOSITION OF DECLARATION OF FLOYD WEBB IN  
OPPOSITION TO PLAINTIFF'S PRELIMINARY INJUNCTION

I'll William V Aguiar III declare as follows;

1. I am the Plaintiff in the above captioned manner. I have personal knowledge of the fact's set forth in this declaration. I am over eighteen years old. If called upon to testify I would and could testify competently to all matter's stated herein
2. I am the Supreme Grand Master of the Black Dragon Fighting Society and I Work for the Department of Youth Service's as a direct care worker working with children. Working With inner city youth from the Boston area and Cape Cod.
  - 3 WE DO NOT CONTEST
  - 4 WE DO NOT CONTEST
  - 5 WE DO NOT CONTEST
  - 6 WE DO NOT CONTEST
  - 7 WE DO NOT CONTEST
  - 8 WE DO NOT CONTEST
  - 9 WE DO NOT CONTEST
  - 10 WE DO NOT CONTEST
  - 11 Now I the Plaintiff have followed the step in the law. In the application of my right as a copyright owner. Plaintiff has followed the letter of the law. And gave Defendant Webb several chance's to sign appropriate copyright agreement's.
  - 12 WE DO NOT CONTEST
  - 13 WE DO NOT CONTEST
  - 14 WE DO NOT CONTEST
  - 15 Defendant Webb sent counter verification in which gave me the option for Federal Court. And Defendant Webb waived his right to Federal Court,

16 WE DO NOT CONTEST

17 WE DO NOT CONTEST

18 WE DO NOT CONTEST

19 This was per DCMA takedown were he filed counter verification. Which he waived his right to Federal Court?

20 WE DO NOT CONTEST

21.

The said video footage Floyd Webb has stolen from my copyrighted video Ballet of Horror from my set that I sell exclusive under my copyright Ballet of Horror Disc 3 it wasn't re-leased to the public on July 17 2001 under copyright no.

Pau2-673-807 World's Deadliest Fighting Secret's. Mr. Webb secured the video From an unlicensed agent. Mr. Webb illegally cut up my DVD'S to take footage to Use for commercial use to post on his trailers. Floyd Webb's footage was up in his Trailers for year's before Mr. Creeden III involvement. Mr. Creeden Jr shot the film In 8mm format exclusively owned by John Creeden JR in the 60's early seventies in Chicago Illinois and In Fall River Massachusetts's. There is no permission of said footage

Even fair use rules don't apply. My deceased father William V Aguiar II is in said Footage and doesn't have my permission to use these image's with out my exclusive License. The said footage owned by Mr. Creeden Jr was not sold to Floyd Webb and has No exclusive license. Mr. Webb cannot produce a signed document's that said they have License for use in his videos by neither Mr. Creeden Jr nor Creeden III.

I Challenge Mr. Webb to produce a signed user agreement's between the parties. Mr. Webb and Mr. Sheppard tried unsuccessfully tried to swindle Mr. Creeden Jr and Mr. Creeden III out of said footage and yes their was a transaction it wasn't complete because There are no signed user agreement from John Creeden III and John Creeden Jr. Yes their Was 1000 paid in two installments' of 500 dollar's. Still with a 500 balance and when Mr.

Creeden III tried to get a signed a user agreement from Mr. Sheppard. Mr. Creeden III Was told that .the footage was given to Ashida Kim / Radford Davis. When Mr. Sheppard Received the footage he told Mr. Creeden III that the footage was worthless and it was Given to Mr. Davis. Mr. Creeden III demanded the footage returned but was turned down By Mr. Sheppard. Mr. Sheppard was used as a buffer used by Mr. Webb to circumvent My said copyright to conspire to under mines my copyrights. In closing I challenge Mr. Webb to produce said signed document's from John Creeden Jr and John Creeden III that Gives defendant Webb exclusive right's to use such footage. There is no signed User agreement's or no verbal agreement's to use such footage in Mr. Webb's trailer's and

Is committing a criminal act. A receipt from Westin Union doe not constitute a signed User agreement. This show Floyd Webb and Barron Sheppard have un-clean hand's That they make accusation's of license and cannot prove such a thing as a license.

22 This from the ad, which I use for my business on E-bay and my other business venture's

23 WE DO NOT CONTEST

24 WE DO NOT CONTEST

- 25 This is part of my two book's of my copyrighted material's the plaintiff own's this is a crucial part of my marketing. The crest and the is from the World's Deadliest Fighting Secret's Book, DVD'S and World's Deadliest Fighting Secret's II .
- 26 WE DO NOT CONTEST
- 27 This is a image from both copyrighted book' and DVD'S. It is a picture of Barbara Kemp and John Keehan Standing behind her.
- 28 This is a image from both copyrighted book' and DVD'S. It is a picture of Barbara Kemp and John Keehan Standing behind her.
- 29 WE DO NOT CONTEST
- 30 WE DO NOT CONTEST
- 31 WE DO NOT CONTEST
- 32 WE DO NOT CONTEST
- 33 WE DO NOT CONTEST
- 34 I the plaintiff William V Aguiar III am the said copyright owner. This image's are directly from both book's. The same sequence appear's in both illustration's of both copyrighted book's HA86679.
- 35 WE DO NOT CONTEST
- 36 WE DO NOT CONTEST
- 37 I the plaintiff William V Aguiar III am the said copyright owner of. This image is directly from both book's front cover. The same sequence appears in both illustrations of both copyrighted book's HA86679.
- 38 WE DO NOT CONTEST
- 39 WE DO NOT CONTEST
- 40 This is a image from both copyrighted book' and DVD'S. It is a picture of Barbara Kemp and John Keehan Standing behind her. The copyright is HA86679.
- 41 WE DO NOT CONTEST
- 42 I the plaintiff William V Aguiar III am the said copyright owner of. This image is directly from both book's front cover. The same sequence appears in both illustration's of both copyrighted book's HA86679
- 43 WE DO NOT CONTEST
- 44 WE DO NOT CONTEST
- 45 I the plaintiff William V Aguiar III am the said copyright owner of. This image is directly from both book's front cover. The same sequence appears in both illustration's of both copyrighted book's HA86679
- 46 WE DO NOT CONTEST
- 47 WE DO NOT CONTEST
- 48 John F Creeden III has been threatened several times and verbally harassed my Mr. Webb and his associated Defendant Barron Sheppard Floyd Webb so called investor. Were to the extent the Defendant Sheppard wouldn't sign a user agreement. To [say Mr. Creeden III called Barron Sheppard's mother in the middle of the night and said he will kill her son] Mr. Creeden wants prove that this hasn't happened to include phone record's the Mr. Creeden III calling from one of his number's. Slander like that is a criminal offense. . Mr. Webb has thrown comments in bad taste and hurled slur's created a

- hostile in-human atmosphere. Furthermore An ex associate of the Plaintiff William V Aguiar III for 18 years who Mr. Webb or Mr. Sheppard have allegedly paid substantial money's for exclusive flyer's that I owned for the Plaintiff to use for a book. By Mr. Webb's verbal and under minded techniques to avoid the rightful copyright owner's claim. Mr. Webb has deliberately under minded my business with other Ashida Kim associate's.
- 49 Mr. Webb has hurled off re-mark to John Creeden III in a derogatory manner unbecoming a human being. Mr. Webb has directly threatened Mr. Creeden in several forums.
- 50 This order does not re-strict free speech at all and does not restrict his artistic expression.

I declare under penalty and perjury under the laws of the United States of America

That these statements are true and correct. Executed the 29 the of October at Fall River Massachusetts's

By pro se William V Aguiar III

Handwritten signature of William V. Aguiar III in cursive script.

10/29/07