

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

John Doe,)	Case No. 3:07CV604
)	
)	Hon. Jack Zouhary
Plaintiff,)	
)	DEFENDANTS EXPERIENCED
)	INTERNET.COM, INC.’S AND
v.)	MAURICIO BEDOYA’S
)	OBJECTIONS TO EVIDENCE
)	SUBMITTED IN SUPPORT OF
SexSearch.com, et al.,)	PLAINTIFF’S MOTION FOR A
)	PRELIMINARY INJUNCTION
)	
Defendants.)	Richard M. Kerger (0015864)
)	KERGER & ASSOCIATES
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)	Gary Jay Kaufman (<i>Pro hac vice</i>)
)	Dana Milmeister (<i>Pro hac vice</i>)
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)	
)	Counsel for Specially Appearing
)	Defendants Experienced Internet.com,
)	Inc., Mauricio Bedoya and Patricia
)	Quesada

Specially appearing defendants Experienced Internet.com, Inc. and Mauricio Bedoya (“Defendants”) hereby object to the exhibits Plaintiff submitted in support of his motion for a preliminary injunction, identified as Exhibits Exhibits 2, 6A, 6B, 8-29, 31-48, 51-58, 60-69 (“TRO Exhibits”) submitted in support of Plaintiff’s *ex parte* request for a temporary restraining order and the entire appendix of exhibits submitted in support of Plaintiff’s preliminary injunction motion (“PI Exhibits”).

Most of the exhibits consist of irrelevant and /or hearsay information that is inadmissible pursuant to Rules 401 *et seq.* and 801 *et seq.* of the Federal Rules of Evidence. Defendants respectfully request that the Court refuse to consider the following exhibits for the reasons listed below:

TRO Exhibits 6A, 6B, 8-29, 31-48 and PI Exhibits 1-8, 10-91: Defendants object to these exhibits on the grounds that these exhibits are irrelevant to the issues to be determined at this hearing and in this lawsuit, or that, if relevant, they are confusing, prejudicial and a waste of time. Fed. R. Evid. 401, *et seq.* Separately, Defendants additional object on the grounds that these exhibits contain inadmissible hearsay. Fed. R. Evid. 801, *et seq.*

Defendants reserve their rights to assert other objections at the hearings in addition to those set forth herein.

Respectfully submitted,

/s/ Richard M. Kerger
RICHARD M. KERGER (0015864)

/s/ Dana Milmeister
Dana Milmeister (*pro hac vice*)
Counsel for Specially Appearing Defendants
Experienced Internet.com, Inc., Mauricio Bedoya
and Patricia Quesada

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been electronically filed this 15th day of April, 2007. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/ Dana Milmeister_____