

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

DOZIER INTERNET LAW, P.C.,)	
)	
Plaintiff,)	
)	
v.)	No. 3:08-cv-00643-HEH
)	
RONALD J. RILEY, <i>et al.</i> ,)	
)	
Defendants.)	

**MOTION TO STRIKE IMPERTINENT AND SCANDALOUS
“BACKGROUND INFORMATION” ALLEGATIONS**

Pursuant to Rules 8(d)(1), 10(b), and 12(f) of the Federal Rules of Civil Procedure, and without waiving lack of personal jurisdiction and venue and failure to serve any of the defendants, defendants move to strike paragraphs 17 through 21 of the complaint as immaterial, impertinent and scandalous, as well as for failure to plead simply, concisely and directly in numbered paragraphs each confined to a single set of circumstances.

Respectfully submitted,

/s/
Thomas M. Wolf, Esq.
Virginia State Bar Number 18234
Attorney for Defendants
LeClair Ryan
951 East Byrd Street, 8th Floor
Richmond, Virginia 23219
Telephone: 804-916-7143
Facsimile: 804-916-7243
Thomas.Wolf@leclairryan.com

Paul Alan Levy, Esq.
DC Bar Number 946400
Gregory Beck, Esq.
DC Bar Number 494479

Attorney for Defendants
Public Citizen Litigation Group
1600 20th Street, N.W.
Washington, DC 20009-1001
Telephone: 202-588-7725
Facsimile: 202-588-7795
plevy@citizen.org

November 13, 2008

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of November, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following::

Donald E. Morris, Esq.
Dozier Internet Law, P.C.
11520 Nuckols Road, Suite 101
Glen Allen, Virginia 23059
Telephone: 804-346-9770
Facsimile: 804-346-0800
Email: don@cybertriallawyer.com

/s/

Thomas M. Wolf, Esq.
Virginia State Bar Number 18234
Attorney for Defendants
LeClair Ryan
951 East Byrd Street, 8th Floor
Richmond, Virginia 23219
Telephone: 804-916-7143
Facsimile: 804-916-7243
Thomas.Wolf@leclairryan.com

Paul Alan Levy, Esq.
DC Bar Number 946400
Gregory Beck, Esq.
DC Bar Number 494479
Attorney for Defendants
Public Citizen Litigation Group
1600 20th Street, N.W.
Washington, DC 20009-1001
Telephone: 202-588-7725
Facsimile: 202-588-7795
plevy@citizen.org
gbeck@citizen.org