

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

DOZIER INTERNET LAW, P.C., )  
)  
Plaintiff, )  
)  
v. )  
)  
RONALD J. RILEY, *et al.*, )  
)  
Defendants. )

No. 3:08-cv-00643-HEH

**ANSWER**

- 1. Admitted.
- 2. Admitted.
- 3. Denied.
- 4. Denied.
- 5. Denied.
- 6. Denied.
- 7. Admitted.
- 8. Admitted.
- 9. Admitted.
- 10. Admitted.
- 11. Admitted.
- 12. Admitted.
- 13. Admitted.

14. It is denied that **all** of the defendants are properly identified as “Riley Businesses.” Some of defendants are not “businesses” and some are not solely controlled by Riley. Otherwise, this

allegation is admitted.

15. Denied.

16. Denied.

17. This allegation is impertinent, irrelevant and scandalous, and it subject to being stricken.

The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. Consequently, defendants have moved to strike this paragraph. To the extent that a response to the paragraph is required, it is so full of factual errors that it is denied.

18. This allegation is impertinent, irrelevant and scandalous, and it subject to being stricken.

The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. Consequently, defendants have moved to strike this paragraph. To the extent that a response to the paragraph is required, it is so full of factual errors that it is denied.

19. This allegation is impertinent, irrelevant and scandalous, and it subject to being stricken.

The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. Consequently, defendants have moved to strike this paragraph. To the extent that a response to the paragraph is required, it is so full of factual errors that it is denied.

20. This allegation is impertinent, irrelevant and scandalous, and it subject to being stricken.

The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. Consequently, defendants have moved to strike this paragraph. To the extent that a response to the paragraph is required, it is so full of factual errors that it is denied.

21. This allegation is impertinent, irrelevant and scandalous, and it subject to being stricken. The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. Consequently, defendants have moved to strike this paragraph. To the extent that a response to the paragraph is required, it is denied.

22. Defendants admit, deny, and respond (and/or object to responding) to the allegations in this paragraph in the same way as they respond to the separately numbered paragraphs and novelistic passages that are incorporated into by reference into this paragraph.

23. Admitted.

24. Defendant lacks sufficient information to admit or deny this allegation, which is accordingly denied.

25. It is admitted that defendant Ronald Riley has created a web page, posted on the Internet at <http://cybertriallawyer-sucks.com/>, that contains instances in which the trademark “Dozier Internet Law” is used as anchor text for a hypertext link, but it is denied that this occurs only twelve times; in fact, it occurs more than twenty times. It is admitted that Dozier Internet Law has numerous web sites, and it is admitted that some of the hyperlinks on the cybertriallawyer-sucks page do not go to any of the Dozier Internet Law web sites. It is admitted that some of the hyperlinks go to a page on the web site, InventorEd.org, but it is denied that this page is or has ever been the main page of the web site; in fact, it is one of the many subpages of that web site, and it is a page that links to several other pages that set forth views about sets forth views about Dozier and his law firm and one of its clients, and specifically about some of the cease-and-desist letters sent by that firm. To the extent not specifically admitted, the allegations of this paragraph are denied.

26. It is admitted that defendant Riley makes free advice available to inventors, including

advice about negotiation of license royalties. He does not provide advice to entrepreneurs and/or business start-ups that are NOT inventors. To the extent not specifically admitted, the allegations of this paragraph are denied. It is specifically denied that Dozier Internet Law offers any services that compete directly with Riley.

27. The allegation is neither simple, direct, nor concise, and it violates the requirement that allegations be set forth in separately numbered paragraphs, each of which sets forth a single circumstance. To the extent that a response to this paragraph is required, it is admitted that persons clicking on some of the links from the web page located at <http://cybertriallawyer-sucks.com/> will be taken to a specific page on the web site of InventorEd.org that links to several other pages that set forth views about Dozier and his law firm and one of its clients, and specifically about some of the cease-and-desist letters sent by that firm. To the extent not specifically admitted, the allegations of this paragraph are denied.

28. It is admitted that the web page at <http://cybertriallawyer-sucks.com/> is a prominent result when any person enters the term “Dozier Internet Law” as a search term on Google. To the extent not specifically admitted, the allegations of this paragraph are denied.

29. Denied.

30. Denied.

31. Defendants admit, deny, and respond (and/or object to responding) to the allegations in this paragraph in the same way as they respond to the separately numbered paragraphs and novelistic passages that are incorporated into by reference into this paragraph.

32. Denied.

#### PRAYER FOR RELIEF

It is denied that plaintiff is entitled to any relief whatsoever. To the contrary, defendants pray



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 18, 2008

## CERTIFICATE OF SERVICE

I hereby certify that on the 18th 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