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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 15 2005

JAWAHERI LINDA M. CLERK
RICHLAND, WA 98921

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT RICHLAND

James S. Gordon, Jr.,
Plaintiff,
vs.

Impulse Marketing Group, Inc.,
Defendant

Impulse Marketing Group, Inc.,
Third-Party Plaintiff,

v.
Emily Abbey, Third-Party
Defendant

Case No.: CV-04-5125-FVS
THIRD-PARTY DEFENDANT'S
MEMORANDUM OF
AUTHORITIES

TO: Clerk of the Court

AND TO: Floyd E. Ivey, Attorney for Third-Party Plaintiff

1 AND TO: Peter J. Glantz and Sean A. Moynihan

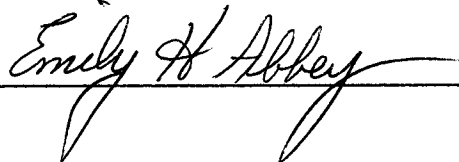
2 Without the benefit of legal training, the undersigned does not
3 have the wherewithal to cite case law or statute to propound a legal
4 rationale for its position below. However, as a matter of equity,
5 Third-Party Defendant should prevail as Impulse appears to have
6 filed this counter suit to intimidate and annoy me or as a delaying
7 tactic to enable Impulse more time to fish for something that does
8 not exist – a nexus to or culpability in an alleged scheme by me.

9 Even to a layperson, Third-Party Plaintiff was obviously not
10 able to elevate its allegations or claims to the level of evidence as
11 none was provided. Innuendo even fails to persuade in the court of
12 public opinion. In the interest of judicial economy, the undersigned
13 pleads that the Court grant Third-Party Defendant's motion to
14 dismiss with prejudice.

15 The undersigned respectfully requests that the Court issue an
16 order granting Third-Party Defendant the dismissal of the claims
17 and counterclaims of Third-Party Plaintiff.

18
19 Emily Abbey
20 1407 2nd Ave West Apt. 608
21 Seattle, WA 98119
22 206-217-0466

23
24 Dated this 10th day of November, 2005

25


1 I, hereby, certify that on November 15th, 2005, I filed with this Court
2 the above memorandum of authorities. The Clerk of the Court will
3 provide electronic notification system using the CM/ECF, which will
4 send an electronic copy of this document to Douglas E. McKinley,
5 Jr., Peter J. Glantz, Sean A. Moynihan, and Floyd E. Ivey. I have
6 served all non-CM/ECF participants, Bonnie Gordon, Jamila
7 Gordon, James Gordon III, Jonathan Gordon, and Robert Pritchett
8 by other means.
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