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

OCT 19 2007

JAMES R. LARSEN, CLERK
DEPUTY
RICHLAND, WASHINGTON

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

Case No.: CV-04-5125-FVS
RESPONSE TO DEFENDANT'S
MOTION TO DISMISS THE
SECOND AMENDED FIRST
AMENDED COMPLAINT

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

v.
Bonnie F. Gordon, Jamila Gordon,
James Gordon III, and Jonathan
Gordon, Third-Party Defendants

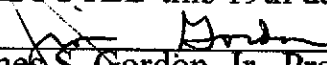
TO: Clerk of the Court
AND TO: Floyd E. Ivey, Attorney for Defendant

1 The information that Impulse's counsel appears to be seeking is:

- 2
- 3 A. Plaintiff has received approximately 3,200 emails form Defendant.
- 4 B. The time period encompasses August 2003 through at least April of 2007.
- 5 C. The only domain is "gordonworks.com". The email addresses were james@;
6 faye@; jamila@; jay@; jonathan@; emily@; business@; cash@; jobs@;
7 links@; lynkstation@; msm@; marketer@; prize@; sd@; telecom@.
8 Plaintiff will review the eighteen thousand or more emails in the Omni v.
9 Impulse lawsuit to see if there are other email names.
- 10 D. The emails have (or had) the Impulse Marketing Group contact information
11 in the email, and/or it contained a domain owned or controlled by
12 Defendant, and/or it featured a product that Defendant had the exclusive
13 right to market.
- 14 E. The cds provide additional details not required by the referenced Order.

15 I declare under penalty of perjury under the laws of the United States that the
16 foregoing is true and correct.

17
18 EXECUTED this 19th day of October, 2007

19 
James S. Gordon, Jr., Pro Se
9804 Buckingham Drive
20 Pasco, WA 99301
509-210-1069
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Certificate of Service

I, hereby, certify that on October 19, 2007, I filed this Response with this Court. I have mailed a copy to counsel of record for defendant. And I have served third party defendants by alternate means

