NO: 2005-CI-19492

RICHARD M. SCOVILLE, INDIVIDUALLY and on behalf of Free Speech Store also known as FSS, FreeSpeechStore.com	*	IN THE DISTRICT COURT
VS.	*	45th JUDICIAL DISTRICT
BRIAN J. BRUNS, AKA ABUSIVE HOSTS BLOCKING LISTS, AHBL.ORG, THE SUMMIT OPEN SOURCE DEVELOPMENT GROUP, SOSDG.ORG, ANDREW D. KIRCH, AKA D&K CONSULTING, TRELANE.NET	*	BEXAR COUNTY, TEXAS

PLAINTIFFS' EX PARTE EMERGENCY
MOTION FOR CONTEMPT, OR IN THE ALTERNATIVE, FOR ISSUANCE
OF SHOW CAUSE ORDER SETTING HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Richard M. Scoville, INDIVIDUALLY and on behalf of Free Speech Store also known as FSS, FreeSpeechStore.com ("FSS") files this its Emergency Motion to Enforce the Court's Temporary Restraining Order ("TRO") and for Contempt and would respectfully show the following:

Plaintiff, Richard M. Scoville, INDIVIDUALLY and on behalf of Free Speech Store also known as FSS, FreeSpeechStore.com has filed its Original Petition in this cause seeking temporary and permanent injunctions against Defendants, BRIAN J. BRUNS, AKA ABUSIVE HOSTS BLOCKING LISTS, AHBL.ORG, THE SUMMIT OPEN SOURCE DEVELOPMENT GROUP, SOSDG.ORG, ANDREW D. KIRCH, AKA D&K CONSULTING, TRELANE.NET. After reviewing all pertinent pleadings, briefs and other filings and arguments of counsel, the Court determined that the Plaintiff's Motion should be in all things granted and issued a Temporary Restraining Order against the Defendants on December 14, 2005

This Motion concerns the Defendants' BRIAN J. BRUNS, AKA ABUSIVE HOSTS BLOCKING LISTS, AHBL.ORG, THE SUMMIT OPEN SOURCE DEVELOPMENT GROUP, SOSDG.ORG, ANDREW D. KIRCH, AKA D&K CONSULTING, TRELANE.NET ("Defendants"). willful and continuing violation of the Court's December 14, 2005 Temporary Restraining Order ("TRO"), which is now in force respective to the Court's ruling.

The Order requires Defendants, inter alia, "...immediately cease and desist from contacting, in any manner, any of Plaintiff's suppliers, customers, affiliates, or those engaging in commerce of any kind with Plaintiff unless Defendants are presently doing business with them on totally unrelated issues and will not mention the Plaintiff, its customers, suppliers, agents, and/or affiliates in any manner, especially to defame or disparage. This part of the order includes the posting of material of any kind referring to Plaintiff, its customers, suppliers, agents, affiliates, etc. to the Internet per se, Usenet (Newsgroups), public forums, chat groups, etc. Defendants are to cease and desist from their campaign of unlawful defamation."

Notwithstanding the clear and explicit requirements of the December 14, 2005 Order, Defendants have refused to comply with the cease and desist from their campaign of unlawful defamation requirements of the Order (see Exhibits "A", "B", & "C"). Defendants' Counsel was apprised of this contempt in Open court on December 28, 2005, but she and her clients chose not to adhere to the Court's Order. This intentional violation of the Order undermines the judicial system and requires that this Court immediately take steps to enforce the Order, including holding Defendants in contempt of Court

II.

BACKGROUND FACTS

1. The court held a hearing on FSS' Ex Parte Motion for a Temporary Restraining Order on December 14, 2005. At the conclusion of the hearing, the court found in favor of FSS and entered the December 14, 2005 Temporary Restraining Order ("TRO") A certified copy of that December 14, 2005 Temporary Restraining Order is incorporated in the file herein. The Order required Defendants, inter alia, "...to cease and desist from their campaign of unlawful defamation."

2. Specifically, the Order provides as follows: "IT IS FURTHER ORDERED that Defendants immediately cease and desist from contacting, in any manner, any of Plaintiff's suppliers, customers, affiliates, or those engaging in commerce of any kind with Plaintiff unless Defendants are presently doing business with them on totally unrelated issues and will not mention the Plaintiff, its customers, suppliers, agents, and/or affiliates in any manner, especially to defame or disparage. This part of the order includes the posting of material of any kind referring to Plaintiff, its customers, suppliers, agents, affiliates, etc. to the Internet per se, Usenet (Newsgroups), public forums, chat groups, etc. Defendants are to cease and desist from their campaign of unlawful defamation "

3. Defendants are fully aware of the entry of the Order. All were properly served with the "TRO" in favor of FSS. See the enclosed proof of service enclosed in the Court's file. Also, defendants have acknowledge their awareness of the content of the "TRO" with postings in the Usenet area of the Internet and postings on their own site AHBL.ORG.

4. Despite the requirement that "Defendants immediately cease and desist from contacting, in any manner, any of Plaintiff's suppliers, customers, affiliates, or those engaging in commerce of any kind with Plaintiff unless Defendants are presently doing business with them on totally unrelated issues and will not mention the Plaintiff, its customers, suppliers, agents, and/or affiliates in any manner, especially to defame or disparage. This part of the order includes the posting of material of any kind referring to Plaintiff, its customers, suppliers, agents, affiliates, etc. to the Internet per se, Usenet (Newsgroups), public forums, chat groups, etc. Defendants are to cease and desist from their campaign of unlawful defamation.", they have postings on their web site which are in direct contempt of this order at the moment of this hearing (again reference aforementioned exhibits).

5. Defendants' refusal to cease and desist from these defaming and disparaging postings as required by the Order is likely to irreparably harm FSS and continue to inflict emotional distress, injury to its reputation, as well as monetary damages

III.

DISCUSSION

Defendants' conduct in refusing to cease and desist from these defamatory and disparaging posts is in flagrant violation of the court's Order, and necessitates swift and resolute action by this Court to enforce the Order. Without such action by the Court, Defendants' willful violation of the Order will be allowed to continue without recourse by FSS to its irreparable harm

A. Court's Inherent Power to Enforce the Order by Holding Defendants in Contempt.

Court's have the inherent power to enforce court orders by finding parties before them in contempt of court. As the Supreme court recognized, "[t]he power to punish a party who fails or refuses to obey a prior order or decree of the court for contempt is an inherent power of a court and is an essential element of judicial independence and authority." Ex parte Barnett, 600 S.W.2d 252, 254 (Tex. 1980); Ex parte Pryor, 800 S.W.2d 511, 512 (Tex. 1990); see also Tex. Gov. Code Ann. 21.001 (stating that courts have all necessary power to enforce lawful orders and to control proceedings). The Texas Rules of Civil Procedure similarly authorize a court to enforce violations of an injunction. Specifically, the rules provide as follows:

Disobedience of an injunction may be punished by the court or judge, in term time or in vacation, as a contempt. . . . On return of such attachment or show cause order, the judge shall proceed to hear proof, and if satisfied that such person has disobeyed the injunction, either directly or indirectly, may commit such person to jail without bail until he purges himself of such contempt, in such manner and form as the court or judge may direct.

iv. P. 692 (emphasis added).

The Court's inherent power to enforce orders through holding a party in contempt is a necessary instrument in order to ensure compliance with court orders. The Supreme Court "has recognized that this power [contempt] enables courts to persuade parties to obey an order or decree of the court so that the order will not be rendered ineffectual by recalcitrant litigants." Ex Parte Pryor, 800 S.W.2d at 512. See also, Ex parte Gibson, 811 S.W.2d 594, 596 (Tex.Crim.App. 1991) (explaining that the essence of contempt is conduct that obstructs or tends to obstruct the proper administration of justice); Ex parte Taylor, 807 S.W.2d 746, 748 (Tex.Crim.App. 199 1) (same).

The purpose of civil contempt, such as that requested by FSS, is remedial and coercive in nature. Ex Parte Werblud, 536 S.W.2d 542, 545 (Tex 1976). As the Texas Supreme Court has explained:

A judgment of civil contempt exerts the judicial authority of the court to persuade the contemptor to obey some order of the court where such obedience will benefit an opposing litigant. Imprisonment is conditioned upon obedience and therefore the civil contemptor carries the keys of [his] prison in [his] own pocket."

Id. (citing Shillitani v. United States, 3 84 U. S. 3 64, 3 68 (1966); Gompers v. Buck Stove & R. Co., 221 U.S. 418, 422 (1910)).

Although there are no Texas cases that are factually analogous to the instant case, the Myrick decision is instructive on the availability of contempt proceedings for enforcement of mandatory injunctions. In Ex Parte Myrick, the court had granted a wife an injunction ordering her husband to execute certain documents transferring property to the wife. Ex Parte Myrick, 474 S.W.2d 767, 768-69 (Tex App. --Houston [1st Dist.] 1971, no writ). The husband subsequently refused or otherwise failed to sign the documents, was held in contempt and ultimately incarcerated. Id. Although ultimately finding the mandatory injunction void for lack of definiteness, the court stated that a court has the power to punish anyone who violates a prohibitory injunction and that "[r]eason compels the conclusion that the same rule should apply to any mandatory order and judgment ...." Id. at 769.

By way of analogy, decisions in the criminal courts also support this Court's ability to enforce the Temporary Restraining Orders through contempt proceedings. In the criminal context, a witness who refuses to testify on the basis of her Fifth Amendment privilege can be held in contempt if she maintains her refusal after being given immunity. Ex Parte Wilkinson, 641 S.W.2d 927, 929-31 (Tex.Crim.App. 1982); Ex Parte Shorthouse, 640 S.W.2d 924, 926 (Tex.Crim.App. 1982) (discussing court's holding witnesses in contempt for failure to testify before grand jury after grant of immunity); Ex Parte Joseph, 356 S.W.2d 789, 791-92 (Tex.Crim.App. 1962) (denying habeas relief to a witness held in contempt for failure to testify after grant of immunity); Ex Parte Jackson, 253 S W. 287

(Tex.Crim.App. 1923). Based on the foregoing cases, Texas law authorizes the Court to enforce the December 14, 2005 Temporary Restraining Order via contempt proceedings.

B. Defendants Should Be Held In Contempt.

Defendants' conduct over the past three (3) weeks demonstrates a clear and unmistakable intent to violate and disregard the Order (see Exhibits "A", "B", & "C") The Order imposed a unequivocal obligation that "Defendants immediately cease and desist from contacting, in any manner, any of Plaintiff's suppliers, customers, affiliates, or those engaging in commerce of any kind with Plaintiff unless Defendants are presently doing business with them on totally unrelated issues and will not mention the Plaintiff, its customers, suppliers, agents, and/or affiliates in any manner, especially to defame or disparage. This part of the order includes the posting of material of any kind referring to Plaintiff, its customers, suppliers, agents, affiliates, etc. to the Internet per se, Usenet (Newsgroups), public forums, chat groups, etc. Defendants are to cease and desist from their campaign of unlawful defamation."

The violation of an injunction is punishable by contempt. See Ex parte Jackman, 663 S.W.2d 520 (Tex.App.--Dallas, 1983, no writ). When faced with such flagrant disregard of a properly issued order granting injunctive relief, Texas courts have not hesitated to make a finding of civil contempt in order to enforce the terms of the injunction. See Ex parte Jackman, 663 S.W.2d 520; Texas Soc. v. Fort Bend Chapter, 590 S.W.2d 156 (Tex.Civ.App.--Texarkana 1979, writ ref. n.r.e.). See also Western Water Management, Inc. v. Brown, 40 F.3d 105 (5th Cir. 1994); Alberti, 610 F.Supp. 138 (holding that the failure to comply with an injunctive order is actionable as contempt of court)

Defendants' conduct in violating the Order is in clear violation of the bedrock principle that court orders must be followed, and requires that the Court enforce the Order by finding Defendants in contempt of court. Accordingly, FSS requests that the Court find Defendants to be in civil contempt of Court, and issue an order requiring Defendants to appear and show cause why he should not be held in civil contempt of court for willful and continuing violation of the trial court's Order.

In the alternative, in the event that the Court determines additional evidence is needed in order to determine contempt, FSS requests that the Court hold an evidentiary hearing. See Ex Parte Boniface, 650 S.W.2d at 778 (describing this to be the preferred procedure when additional evidence is required); Ex Parte Werblud, 536 S.W.2d 542 (Tex 1976) (describing this to be the preferred procedure when additional evidence is required).

C. The Court Should Rule on this Motion Immediately,

At the "TRO" hearing, FSS offered evidence demonstrating that any delay by Defendants in ceasing the defaming and disparaging postings could irreparably harm FSS.

Defendants' refusal to comply with the cease and desist requirement of the Order makes it impossible for FSS to continue with its daily business without the threat of loss such

business by a simple Google search of Defendants' web site containing this misinformation. This is precisely the harm that the Court Ordered TRO sought to remedy through entry of the Order. As such, FSS respectfully requests that the Court consider this as an emergency motion, and rule on it prior to the expiration of ten (10) days. In the alternative, FSS respectfully requests that the Court schedule this Motion for hearing at the earliest possible time, in order to enable FSS to present further argument concerning why Defendants disobedience of the Order requires an Order of the Court and/or Monetary Sanctions

WHEREFORE, PREMISES CONSIDERED, FSS moves for the Court to treat this as an emergency motion and to enter an order holding Defendants in civil contempt of Court for their willful and purposeful refusal to comply with the trial court's Temporary Restraining Order.

Respectfully submitted,

RICHARD M. SCOVILLE
P.O. Box 120442
San Antonio, Texas 78212
207-510-9474
PLAINTIFF, PRO SE

AFFIDAVIT

STATE OF TEXAS *

COUNTY OF BEXAR *

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this date personally appeared RICHARD M. SCOVILLE, who having been duly sworn, subscribed his name above and then deposed and stated under oath that he has read the foregoing Motion, and each and every fact stated therein is to his personal knowledge true and correct.

Signed and sworn to before me on this 25th day of January, 2006.

NOTARY PUBLIC
STATE OF TEXAS

My commission expires:

FIAT

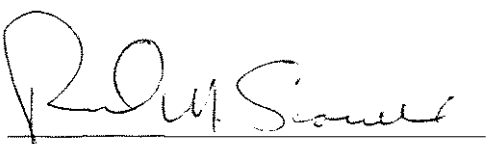
On this 5th day of January, 2006 the foregoing MOTION FOR CONTEMPT, OR IN THE ALTERNATIVE FOR THE ISSUANCE OF SHOW CAUSE ORDER SETTING HEARING was brought to the attention of the Court, and the same is hereby set for hearing on the _____ day of January, 2006 at _____ ____.m., before the Presiding District Judge of Bexar County, Texas, sitting on the 2nd Floor, Bexar County Courthouse, San Antonio, Bexar County, Texas.

SIGNED AND ENTERED this _____ day of January, 2006.

_____
JUDGE PRESIDING

CERTIFICATE OF SERVICE

I hereby certify that I have forwarded a true and correct copy of the foregoing Motion, together with a completed FIAT setting same for hearing, to all opposing counsel in accordance with the Texas Rules of Civil Procedure, on this 5th day of January, 2006.



RICHARD M. SCOVILLE

EXHIBIT “A”

The Abusive Hosts Blocking List

Harassment by The FreeSpeechStore
It has been recently brought to our attention that Richard Scoville of The FreeSpeechStore is harassing AHBL users and our providers, as well as filing false police reports to cause problems with the people who he disagrees with.

FAQ
Q: Who is Richard Scoville?

A: Richard Scoville is known as the FreeSpeechStore (FSS, Margaret Morice, and other knicknames include FreaSpeachWhore). He runs a site where people can post statements and demand that the accused have to pay to read what he or other people wrote about them. Most of his comments about people are false, and tend to be of a libelous nature (Pay-per-libel, as we call it). In the past, he has been known to spam his libel to the victim, though as of late, he has stopped doing this.

He is located in San Antonio, TX.

Q: Is there information available online about him?

A: Yes, there are quite a few links - here are a few:
- Harassment by Margaret Morice / Richard M Scoville
- RipOffReport: Freespeechstore.com
- interocitor.net: Response to freespeechstore.com
- FreaSpeachK00k Mini-FAQ

Q: How many providers has he been kicked off of?

A: The current running-count is 3-5, however it depends on how you look at it. Prismnet/VNDX, ESpire, Grandecom, and now he is on RoadRunner business. He's also switched registrar over to VNDX again.

Q: What should we do if we are contacted/harassed by Richard Scoville?

A: If you are contacted or harassed by Richard Scoville, you should first tell him to cease any and all contact with you. If he refuses, and continues to contact you, file a police report for harassment. Scoville is also known for filing false police reports against people he doesn't like (he's filed several against the SOSDG and AHBL so far).

You should also consider speaking with a lawyer and finding out what options may be available to you legally (including libel/slander, harassment, extortion if he tried to make you pay to get him to leave you alone, etc)

Q: What were the false police reports over?

A: As far as we know, they were filed because people are using the tool 'wget' to spider and download his whole site. People only started doing this AFTER he went public calling 'wget' a hacking tool. For legal reasons, anyone who makes threats at us will have their site archived in case the information should ever be needed in the future (and wget fits this need perfectly).

We believe he is filing false abuse reports claiming that we are the ones doing it to

him, even though they are coming from random IP space worldwide that we have no control over. We also suspect he has taken to forging log files in an attempt to cause issues.

Q: Is 'wget' a hacking tool?

A: No, and any experienced systems administrator or Linux user will tell you that it is one of the most useful tools that one can have on their machine. Wget is a file downloading tool that can be used to download from FTP or HTTP. and features spidering capibilities.

Wget is free software provided by The Free Software Foundation.

Q: Is this page a statement of fact?

A: No, it is page designed to give people the ability to easily locate information online about Richard Scoville, as well as some information from our own interactions with him. People are encouraged to read all the pages and decide for themselves.

EXHIBIT “B”

The Abusive Hosts Blocking List

Cart00ney from FreeSpeechStore - Oct 27, 2003

Also from FreeSpeechStore:
http://freespeechstore.com/public/489_Beware_of_Brian_Bruns_Another_Anti-Spammer...Starts_Up_Abusive_Service.htm

Return-path: <Freespeechstore@aol.com>
Envelope-to: bruns@2mbit.com
Delivery-date: Mon, 27 Oct 2003 21:40:23 -0500
Received: from imo-m07.mx.aol.com ([64.12.136.162])
by mail.2mbit.com with esmtp (Exim 4.24)
id 1AEJmQ-0003vq-EZ
for bruns@2mbit.com; Mon, 27 Oct 2003 21:40:22 -0500
Received: from Freespeechstore@aol.com
by imo-m07.mx.aol.com (mail_out_v36_r1.1.) id 2.62.3695519c (16781);
Mon, 27 Oct 2003 21:38:52 -0500 (EST)
From: Freespeechstore@aol.com
Message-ID: <62.3695519c.2ccf30bc@aol.com>
Date: Mon, 27 Oct 2003 21:38:52 EST
To: abuse@inflow.net, abuse@algx.net
CC: bruns@2mbit.com, TOSGeneral@aol.com
MIME-Version: 1.0
X-Mailer: 9.0 for Windows sub 5100
X-SA-Exim-Mail-From: Freespeechstore@aol.com
Subject: ABUSIVE & HARASSING EMAILS FROM YOUR SERVER(S) and bruns@2mbit.com ...
Content-Type: multipart/mixed; boundary="part1_62.3695519c.2ccf30bc_boundary"
X-Spam-Checker-Version: SpamAssassin 2.60 (1.212-2003-09-23-exp) on everest.2mbit.com
X-Spam-Report:
* 0.2 NO_REAL_NAME From: does not include a real name
* 2.3 DEAR_SOMETHING BODY: Contains 'Dear (something)'
* 0.1 HTML_MESSAGE BODY: HTML included in message
* -4.9 BAYES_00 BODY: Bayesian spam probability is 0 to 1%
* [score: 0.0000]
X-Spam-Status: No, hits=-2.3 required=7.0 tests=BAYES_00,DEAR_SOMETHING, HTML_MESSAGE,NO_REAL_NAME autolearn=no version=2.60
X-Spam-Level:
X-SA-Exim-Version: 3.1 (built Tue Oct 14 21:11:59 EST 2003)
X-SA-Exim-Scanned: Yes
Status:

Dear Sir/Madam..

This person, AKA [munged]@aol.com, continues to harass and threaten us, via emails, through your servers. If it continues, we will seek our legal remedies against them, as well as you. In addition, this instant email came through AOL IM...."[munged]: you having fun spamming usenet again?" moments ago!

Respectfully,
FSS

WHOIS results for 2mbit.com
Generated by www.DNSstuff.com
I was referred to whois.bulkregister.com; I'm looking it up there

Using cached answer (or, you can get fresh results).

Them Industries
Hjortsbergavagen 16D
Alvesta, non-US 342 36
SE

Domain Name: 2MBIT.COM

Administrative Contact-
Jonas Thern: raven@2mbit.com
Thern Industries
Hjortbergavagen 16D
Alvesta, non-US 342 36
SE
Phone- +4647214401
Fax-
Technical Contact-
Brian Bruns: bruns@2mbit.com
The Summit Open Source Development Group
54 Clinton Avenue
Hillsdale, New Jersey 07642
US
Phone- xxxxxxxxxxxxxxxxxxxx
Fax-

Record update date: 2002-10-30 10:07:11
Record create date: 2000-10-29
Record expires on: 2003-10-29
Database last updated on: 2003-10-27 21:20:50 EST

Domain servers in listed order:

NS1.DNSPARK.COM 64.245.56.175
NS2.DNSPARK.COM 81.29.64.97

WHOIS results for 64.245.56.175Generated by www.DNSstuff.comCountry: UNITED STATES

NOTE: More information appears to be available at NET-64-245-56-128-1.

Using cached answer (or, you can get fresh results).

Allegiance Telecom Companies Worldwide ALGX-ABI-BLK16 (NET-64-244-0-0-1)
64.244.0.0 - 64.245.255.255
Inflow INFLOW-AUS1-2 (NET-64-245-48-0-1)
64.245.48.0 - 64.245.63.255
Cyberspace Technology INFLOW--58807-9177 (NET-64-245-56-128-1)
64.245.56.128 - 64.245.56

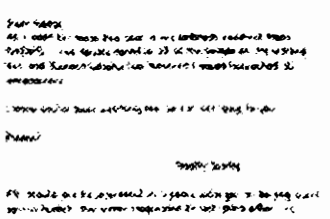
(C) Copyright 2000-2003 Computeriz

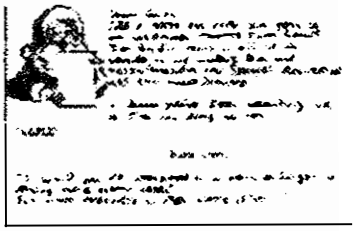
```
Return-path: <Freespeechstore@aol.com>
Envelope-to: bruns@2mbit.com
Delivery-date: Tue, 28 Sep 2004 10:41:24 -0500
Received: from imo-d20.mx.aol.com ([205.188.139.136])
        by mail.sosdg.org with esmtp (Exim 4.42-SOSDG)
        id 1CCK6U-0007gK-Mq
        for <bruns@2mbit.com>; Tue, 28 Sep 2004 10:41:24 -0500
Received: from Freespeechstore@aol.com
        by imo-d20.mx.aol.com (mail_out_v37_r3.7.) id h.1a1.2a563202 (17377)
         for <bruns@2mbit.com>; Tue, 28 Sep 2004 11:41:05 -0400 (EDT)
From: Freespeechstore@aol.com
Message-ID: <1a1.2a563202.2e8ae011@aol.com>
Date: Tue, 28 Sep 2004 11:41:05 EDT
To: bruns@2mbit.com
MIME-Version: 1.0
X-Mailer: 9.0 for Windows sub 5000
Received-SPF: pass (everest.sosdg.org: domain of aol.com designates 205.188.139.136
X-Scan-Signature: cd165b7b5f6886dfcb45c9ed7c6d9e47
X-SA-Exim-Connect-IP: 205.188.139.136
X-SA-Exim-Mail-From: Freespeechstore@aol.com
Subject: FreeSpeechStore Speech Notification
Content-Type: multipart/alternative; boundary="------------------------------10963860
X-Spam-Checker-Version: SpamAssassin 2.64 (2004-01-11) on everest.sosdg.org
X-Spam-Level: ***
X-Spam-Status: No, hits=3.9 required=9.0 tests=CLICK_BELOW,
        HTML_LINK_CLICK_HERE,HTML_MESSAGE,HTTP_ESCAPED_HOST,NO_REAL_NAME,
        REMOVE_PAGE,SELECTED_YOU autolearn=no version=2.64
X-Spam-Report:
        *  0.2 NO_REAL_NAME From: does not include a real name
        *  1.4 SELECTED_YOU BODY: They have selected you for something
        *  0.1 HTML_LINK_CLICK_HERE BODY: HTML link text says "click here"
        *  0.1 HTML_MESSAGE BODY: HTML included in message
        *  0.5 REMOVE_PAGE URI: URL of page called "remove"
        *  1.5 HTTP_ESCAPED_HOST URI: Uses %-escapes inside a URL's hostname
        *  0.1 CLICK_BELOW Asks you to click below
X-SA-Exim-Version: 4.1 (built Tue, 17 Aug 2004 17:11:03 -0500)
X-SA-Exim-Scanned: Yes (on mail.sosdg.org)
Status:


------------------------------1096386065
Content-Type: text/plain; charset="UTF-8"
Content-Transfer-Encoding: quoted-printable
Content-Language: en

=20
The following  is an automated message:

You have been  selected by user FSS from _www.freespeechstore.com  (FSS) _=20
(http://www.freespeechstore.com%20(fss)/)  , to receive his/her speech title=
d =E2=80=9C=20
_Brian Bruns of  ahbl.org, sosdg.org, 2mbit.com To Be Sued _=20
(http://www.freespeechstore.com/Qresults.asp?record=3D2154) =E2=80=9D. This=20=
is a "one time  only"=20
notification and you will not be notified again. We would like to remind  yo=
u that the=20
said manifest is currently public in abstract form only and the  complete=20
text is proprietary for members of _FSS_ (http://www.freespeechstore.com/) =20=
, a=20
```

```
web site/database where  articles, letters, complaints, compliments,=20
information, spam reports, virus  alerts, etc., and/or opinions about any su=
bject can be=20
recorded for future  reference and/or a future search by any and all=20
interested parties. (_Speeches in the Public  Domain_=20
(http://www.freespeechstore.com/public) ). This site is intended to collect=20=
and disseminate information on =20
one site where you can retrieve and/or post the truth. _Click here to learn=20=
=20
more..._ (http://www.freespeechstore.com/MISSIONstatement.htm) =20
Thanks,=20
The  FreeSpeechStore team. _
http://www.freespeechstore.com_ (http://www.freespeechstore.com/)=20

_
Click here for  instructions on how to be removed permanently from any and=20
all future email  notifications!_=20
(http://www.freespeechstore.com/removeme.asp?id=3D2154)=20


=20

-------------------------------1096386065
Content-Type: text/html; charset="UTF-8"
Content-Transfer-Encoding: quoted-printable
Content-Language: en

<!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.0 Transitional//EN">
<HTML><HEAD>
<META http-equiv=3DContent-Type content=3D"text/html; charset=3DUTF-8">
<META content=3D"MSHTML 6.00.2900.2180" name=3DGENERATOR></HEAD>
<BODY id=3Drole_body style=3D"FONT-SIZE: 10pt; COLOR: #000000; FONT-FAMILY:=20=
Arial"=20
bottomMargin=3D7 leftMargin=3D7 topMargin=3D7 rightMargin=3D7><FONT id=3Drol=
e_document=20
face=3DArial color=3D#000000 size=3D2>
<DIV>
<DIV><FONT style=3D"BACKGROUND-COLOR: transparent" face=3DArial color=3D#000=
000=20
size=3D2><FONT face=3D"Verdana, Arial, Helvetica, sans-serif" size=3D2>The f=
ollowing=20
is an automated message:</FONT></DIV>
<BLOCKQUOTE=20
style=3D"PADDING-LEFT: 5px; MARGIN-LEFT: 5px; BORDER-LEFT: blue 2px solid">
  <P><FONT face=3D"Verdana, Arial, Helvetica, sans-serif" size=3D2>You have=20=
been=20
  selected by user FSS from <A title=3D"http://www.freespeechstore.com (fss)=
/"=20
  href=3D"http://www.freespeechstore.com%20(fss)/">www.freespeechstore.com=20
  (FSS)</A> , to receive his/her speech titled =E2=80=9C<STRONG> <A=20
  title=3Dhttp://www.freespeechstore.com/Qresults.asp?record=3D2154=20
  href=3D"http://www.freespeechstore.com/Qresults.asp?record=3D2154">Brian B=
runs of=20
  ahbl.org, sosdg.org, 2mbit.com To Be Sued </A></STRONG>=E2=80=9D. This is=20=
a "one time=20
  only" notification and you will not be notified again. We would like to re=
mind=20
  you that the said manifest is currently public in abstract form only and t=
he=20
  complete text is proprietary for members of <A=20
```

```
  title=3Dhttp://www.freespeechstore.com/=20
  href=3D"http://www.freespeechstore.com/">FSS</A> , a web site/database whe=
re=20
  articles, letters, complaints, compliments, information, spam reports, vir=
us=20
  alerts, etc., and/or opinions about any subject can be recorded for future=
=20
  reference and/or a future search by any and all interested parties. (<A=20
  title=3Dhttp://www.freespeechstore.com/public=20
  href=3D"http://www.freespeechstore.com/public">Speeches in the Public=20
  Domain</A>). This site is intended to collect and disseminate information=20=
on=20
  one site where you can retrieve and/or post the truth. <A=20
  title=3Dhttp://www.freespeechstore.com/MISSIONstatement.htm=20
  href=3D"http://www.freespeechstore.com/MISSIONstatement.htm">Click here to=
 learn=20
  more...</A></FONT></P>
  <P><FONT face=3D"Verdana, Arial, Helvetica, sans-serif"=20
size=3D2>Thanks,</FONT></P>
  <P><FONT face=3D"Verdana, Arial, Helvetica, sans-serif" size=3D2>The=20
  FreeSpeechStore team.</FONT> <EM><FONT=20
  face=3D"Verdana, Arial, Helvetica, sans-serif" size=3D2><A=20
  title=3Dhttp://www.freespeechstore.com/=20
  href=3D"http://www.freespeechstore.com/"><BR><FONT=20
  size=3D2>http://www.freespeechstore.com</FONT></A><BR><A=20
  title=3Dhttp://www.freespeechstore.com/removeme.asp?id=3D2154=20
  href=3D"http://www.freespeechstore.com/removeme.asp?id=3D2154"><BR>Click h=
ere for=20
  instructions on how to be removed permanently from any and all future emai=
l=20
  notifications!</A></FONT></EM></P></FONT></BLOCKQUOTE></DIV>
<DIV></DIV>
<DIV> </DIV></FONT></BODY></HTML>

------------------------------1096386065--
```

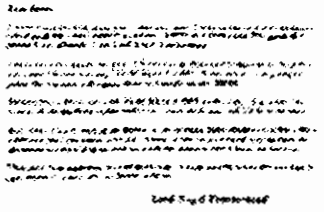
EXHIBIT "C"





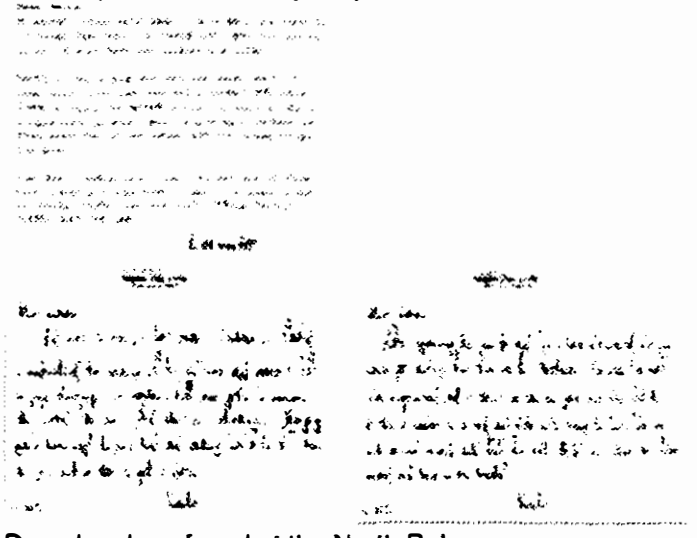
All Snotty Scotty wants for Christmas is to be delisted from SPEWS.

Nigel Featherhead



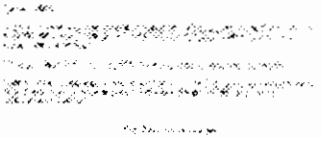
Nigel needs a spammer proof e-mail address.

Lamie (with Santa's replies)



Dazed and confused at the North Pole.

FreeSpeaksWhore



Apparently Santa doesn't like FSS either.

XR

XR decides to use the SSPBL to put someone else out of business

EMarketersAmerica

I saw three spams come sailing in...

Site design version 10.0r25

Welcome to The FreaSpeaksWhore!
Current Article Listing In Order Of Posting Date (1-5)

1. What do Santa Claus and PUNKS have in common?
Author: FSW.PUNKWATCH
Abstract: Santa Claus, AKA PUNK CHRISTOPHER KRINGLE, is one of the FILTHIEST PUNKS on NET, providing sexually PREVERSE TOYS to PUNKS... This SEXUAL PERVERT watches YOU and likes to SOLICIT SODEMY! Steer clear of this PUNK!

2. Dick Scumersville has been naughty this year!
Author: SANTAS.SLEIGH
Abstract: Dicky has been a naughty boy this year - threatening people with million dollar lawsu that are never filed. This child even had the nerve to call the North Pole pretending to be me a tried to cancel all toy shipments to children worldwide just because he got a lump of coal in his stocking! Why can he just be a good boy for one year?

3. PUNK SANTAS.SLEIGH illegally uses FIREFOX to hack FreaSpeaksWhore website!
Author: HACKERWHACKER
Abstract: This FILTHY PUNK has used the HACKER TOOL FIREFOX to HACK THE FSW WEBSITE This PERVERT has been reported to the SAPD and NORTH POLE INVESTIGATIVE DEPARTMENT! Watch out soon for the MULTI-MILLION DOLLAR LAWSUIT!

4. PUNK STOCK CONTINUES TO GO DOWN!
Author: STOCK.WATCH
Abstract: The PUNK Santa Claus is TREMBLING IN FEAR FROM the THREAT of a MULTI-MILLIO DOLLAR LAWSUIT from the FREASPEAKSWHORE! His production LINES ARE FAILING. This is SIGN OF IMPENDING DOOM FOR THIS FILTHY PUNK!

5. SANTA CLAUS involved with NAZI EAR IMPLANTS!
Author: BABS.MCGEE
Abstract: Document 1, E-mail between Santa Claus (aka Christoper Kringle), shows that he conspired with the North Pole library to deny me my freaspeech rights to use their computers! FOIA requests show that Kringle partnered with the Nazi Secret Service (SEGNPMSS)!

DEAR SANTA,

USER FSS FROM WWW.FREASPEAKSZTORE.COM WOULD LIKE TO NOTIFY YOU OF A BRAND NEW REVISION OF HIS/HER SPEECH TITLED "SANTA CLAUS IS A KOOKY ANTISPAMMER"

IT WILL ONLY COST YOU $19.95 TO READ THIS LIBEL AND SLANDER!

SANTA, YOUR SLANDEROUS ABUSE REPORTS TO MY ISP WILL BE PROSECUTED! HOW DARE YOU COMPLAIN ABOUT THE FREASPEAKSZTORE, YOU NAZI CENSORSHIP SANTA!!

THE FREESPEAKSWHORE