
From: "David Maddox" <david@dmaddox.com>
To: "Cathy Dean" <cdean@pswslaw.com>
Sent: Friday, March 10, 2006 5:23 PM
Subject: RE: Peri Hall, et al. v. Elliot Institute and David Reardon

Cathy:

On further review, I challenge the language of your Order draft. Quoting from your draft, "Defendants . . . must, within 24 hours of entry of this Order, make their website, www.elliotinstitute.org, inaccessible to internet users . . ." I submit that the Court ordered the Defendants to remove their website that was (allegedly) copied from the Missouri Cures website only. The Defendants were not ordered by the Court to have no website, only one that infringed the Plaintiff's website. Your co-counsel said in Court that the Order would be specific about what was covered by the Order. As drafted, this Order throws everything out.

I suggest that the first sentence read:

"WHEREFORE, IT IS ORDERED that Defendants, Elliot Institute for Social Sciences Research and David C. Reardon must, within 24 hours of entry of this Order, eliminate from their website, known as www.elliotinstitute.org, three contested pictures and any reference to the trademarked names in their metatags, or any elements copied from the Plaintiff's website, etc."

Please change the Order submitted to the Court in accordance with the language above, or contact me. I have advised Mr. Reardon of the Court's action.

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-----Original Message-----

From: Cathy Dean [<mailto:cdean@pswslaw.com>]
Sent: Friday, March 10, 2006 3:54 PM
To: David Maddox
Subject: RE: Peri Hall, et al. v. Elliot Institute and David Reardon

Thanks for the email. The court called to say that the hearing on the preliminary

injunction will be at 3:00 next Friday. That will be part of the order. cd

From: David Maddox [mailto:david@dmaddox.com]
Sent: Friday, March 10, 2006 3:42 PM
To: Cathy Dean
Subject: Peri Hall, et al. v. Elliot Institute and David Reardon

Dear Ms. Dean:

The following is my contact information, in case you have any trouble reaching me. I look forward to receiving the Order at your convenience. It was a pleasure meeting you today via telephone. Congratulations on your success!

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