

**Crystal M. Henry, OSB # 04312**

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Attorney for Plaintiffs Keith Goodridge Construction  
and Keith Goodridge

UNITED STATES DISTRICT COURT

THE DISTRICT OF OREGON

KEITH GOODRIDGE CONSTRUCTION,	)	
KEITH GOODRIDGE, and MARJORIE	)	Case No. 6:08-CV-6313-TC
GOODRIDGE,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	SECOND AMENDED
	)	COMPLAINT(Defamation, IIED,
WYBS, INC., a Delaware Corporation,	)	Interference with Business Relations)
doing business as MERCHANTCIRCLE,	)	
SUSAN GATCHELL, and ANTHONY	)	
GATCHELL	)	(Not Subject to Mandatory
	)	Arbitration)
Defendants.	)	
	)	

COMES NOW, Keith Goodridge and Keith Goodridge Construction, by and through their counsel of record, Crystal M. Henry and The VanderMay Law Firm, and complains and alleges as follows:

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1 SECOND AMENDED COMPLAINT (Defamation, IIED,  
Interference with Business Relations)

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The VanderMay Law Firm  
388 State Street, Suite 340  
Salem, Oregon 97301  
(503) 588-8053

**COMMON FACTUAL ALLEGATIONS**

1.

At all times relevant herein, Keith Goodridge is and was a natural person living just outside the City of Lebanon, County of Linn, State of Oregon.

2.

At all times relevant herein, Keith Goodridge Construction is and was a sole proprietorship wholly owned by Plaintiff Keith Goodridge, with its principal place of business located just outside the City of Lebanon, County of Linn, State of Oregon.

3.

At all times relevant herein, WYBS, Inc., is and was a Delaware corporation doing business under the fictitious name MerchantCircle, who owns the web site www.MerchantCircle.com, registered to do business in the State of California. Both WYBS, Inc. and MerchantCircle advertise a principal place of business at 201 Main Street, Suite 100, Los Altos, CA 94022. Neither entity name is registered to do business in the State of Oregon to the knowledge of Plaintiffs.

4.

Despite having a principal place of business within the State of California, Defendant WYBS, Inc., doing business as MerchantCircle (hereinafter "Defendant MerchantCircle") solicits web site business to local merchants in the State of Oregon and advertises on its web site that it performs such services for companies located in the State of Oregon.

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5.

Under information and belief, Defendants Susan and/or Anthony Gatchell "Attorney" operate under the fictitious name "Attorney" and under information and belief and as Defendants Susan and Anthony Gatchell "Attorney" states he has knowledge of persons who have done business with Plaintiff's, they reside in the city of Lebanon, Linn County, Oregon.

6.

On or about Thursday, July 10, 2008, Plaintiff Keith Goodridge Construction was bidding a construction job. While bidding this job, the potential client of Plaintiff Keith Goodridge Construction, Inc., informed Plaintiff Keith Goodridge that he had heard Plaintiff Keith Goodridge Construction had killed a teenager. Potential client told Plaintiff Keith Goodridge that he read this information on [www.MerchantCircle.com](http://www.MerchantCircle.com), and would not do business with Plaintiffs unless he knew how the teenagers death had occurred.

7.

Plaintiff then asked potential client to show him the posting. Plaintiff viewed the following posting on [www.MerchantCircle.com](http://www.MerchantCircle.com) on July 10, 2008:

"KEITH GOODRIDGE CONSTRUCTION UNSAFE-CAUSED DEATH OF TEENAGER"

I am not at liberty to disclose all the facts as of this time, so I will share what information I can.

Keith A Goodridge Construction Manufactured/Built an outdoor arena located in Lebanon, Oregon. There was a teenager riding in the arena and due to lack of proper building materials and lack of solid foundation for the structure it collapsed when the teenager and the horse bumped one of the main beams on the corner of the structure. The teen was killed and the horse struggled free only to be humanely destroyed later

due to injuries. Parents of the teenager are seeking an undisclosed amount for obvious reasons.

June 04, 2008 by Attorney”

This posting is attached hereto and incorporated herein as Exhibit A.

8.

Plaintiffs then conducted a reasonable investigation into all prior horse arena construction performed by Plaintiffs. Plaintiffs have reasonably determined that the posting on [www.MerchantCircle.com](http://www.MerchantCircle.com) has no merit.

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The above referenced posting appears in no less than three distinct addresses on the Internet including <http://www.MerchantCircle.com/business/Goodridge.Keith.Construction.547-258-8920> attached hereto as exhibit A and incorporated by reference herein as a consumer review; <http://www.MerchantCircle.com/business/Goodridge.Keith.Construction.547-258-8920/rev...> attached hereto as exhibit B and incorporated by reference herein as a consumer review; and at [www.MerchantCircle.com/directory/Or-Lebanon-97355](http://www.MerchantCircle.com/directory/Or-Lebanon-97355) as evidenced by exhibit C which is attached hereto and incorporated by reference herein as a directory.

10.

The [www.MerchantCircle.com](http://www.MerchantCircle.com) website only allows a third party to post a review in one place. Defendant therefore published the above referenced posting of its own volition on at least two occasions making defendant responsible for the content of the above referenced posting.

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11.

Plaintiff viewed the following posting on www.MerchantCircle.com on December 12, 2008:

“KEITH GOODRIDGE BUSINESS SUCKS!!

Keith & Marg Goodridge screwed me over and I lost lots of money which will never be seen again. They are as crooked as they come. Their work is not safe, not fair and very high priced. They are so crooked they passed off an old raggy nasty looking half dead arabian horse to their neighbors because they could not take care of it and feed it right. They have some of the ugliest horses ever by the way. Their neighbor had a barn built and they tried to over charge her and the barn is built very weak and nothing more than a lean to with sides for a huge amount of money. I would not suggest anyone do business with them.

November 21, 2008 by ... in Albany, OR”

This posting is attached hereto and incorporated herein as Exhibit F.

12.

After learning of the November 21, 2008 posting on MerchantCircle, Plaintiff by and through their counsel of record sent a letter to counsel for MerchantCircle in accordance with ORS 31.215 requesting a retraction.

13.

The posting was then removed from the MerchantCircle website. However, a retraction has not been published. As with the posting of June 4, 2008, the more recent posting of November 21, 2008 continued to be available on the Internet, in a different directory than it was previously posted on, when one performed a google search through www.google.com.

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14.

Defendant MerchantCircle has republished the above referenced November 21, 2008 statement and made it their own statement by having it appear in a different location than it was originally posted at. Like the June 1, 2008 posting referenced above, the November 21, 2008 posting appeared in at least three Internet locations including <http://www.MerchantCircle.com/business/Total.Pest.Control.541-258-8920/review/list> as evidenced by exhibit F attached hereto and incorporated by reference herein as a consumer review; <http://www.MerchantCircle.com/business/Total.Pest.Control.541-258-8920> evidenced by exhibit G attached hereto and incorporated by reference herein as a customer review; and [www.MerchantCircle.com/directory/OR-Albany-97322](http://www.MerchantCircle.com/directory/OR-Albany-97322) as shown on exhibit H attached hereto and incorporated by reference herein as a directory.

15.

Defendant MerchantCircle is a publisher of the content of the above referenced postings because it assisted in the development of the content in the following ways:

1. Defendant republished the content in multiple directories as evidenced in exhibits A, B, and C.
2. Defendant actively encouraged and solicited postings as evidenced by exhibit D.
3. Defendant is solely responsible for the entire balance of the content of the web pages on which the above referenced posting appears.
4. Defendant allows merchants who contract with Defendant to control the content of information about the merchant on its website but does not allow merchants

that do not contract with Defendant to control the content of information about them. See exhibit E.

5. Defendant has sought to protect the identity of the author of the above referenced posting. Plaintiffs initially requested this information from Defendant by letter on July 15, 2008. Defendant has not provided the information to date. The information is collected by Defendant at the time a posting is made as evidenced by exhibit K attached hereto and incorporated by reference herein.

16.

Defendant MerchantCircle published the above referenced posting in its directory for the purpose of using the content of the posting to facilitate defendant's advertising banner's appearance above the posting's listing in Google's search results for Keith Goodridge. See exhibit C.

17.

In addition to republishing content provided by third parties, Defendant has published false information about Plaintiffs and Plaintiffs' relationship with Defendant's website. Defendant is publishing a blog purported to be of Keith Goodridge Construction and inviting viewers to contact Keith Goodridge Construction through its website. See exhibit I attached hereto and incorporated by reference herein. Plaintiffs do not maintain a blog with MerchantCircle and cannot be contacted through them. The blog advertises deals and coupons. However, Keith Goodrich Construction does not offer deals or coupons.

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18.

On December 12, 2008, Plaintiffs viewed a posting on Craigslist entitled, "Do You Know These Crooks???", which is attached hereto as Exhibit M and incorporated herein. Plaintiffs sent a letter, through their counsel, to Defendants Susan and Anthony Gatchell requesting that they notify The VanderMay Law Firm to deny responsibility if they did not author the posting on Craigslist. Defendants Susan and Anthony Gatchell did not reply.

**FIRST CLAIM FOR RELIEF**

(Defamation: Against Defendant MerchantCircle)

19.

Plaintiffs incorporate paragraphs 1-18 as if fully incorporated and set forth herein.

20.

After learning of the June 4, 2008 posting on www.MerchantCircle.com, Plaintiffs, by and through their counsel of record, sent a certified mail and regular U.S. mail letter to MerchantCircle at their principal place of business as listed on their web site, 201 Main Street, Suite 100, Los Altos, CA 94022 in accordance with ORS 31.215.

21.

After learning of the November 21, 2008 posting on MerchantCircle.com, Plaintiff sent a letter certified mail and regular U.S. Mail letter to counsel for MerchantCircle in accordance with ORS 31.215.

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22.

The return receipt for the for the certified mailing described in paragraph twenty (20) was received by counsel for Plaintiffs on July 23, 2008 and was apparently signed by a "Nava Bromberger," though no date of delivery was acknowledged by that individual. The return receipt was received July 23, 2008, back at the offices of The VanderMay Law Firm, indicating that this notice was received by Defendant MerchantCircle no later than July 22, 2008. Despite the requests for corrections or retractions at least as conspicuous as the original posting, no such corrections or retractions have been made by Defendant MerchantCircle.

23.

As www.MerchantCircle.com is an Internet web site that is not password protected, it is opened to the public and has therefore been published to third persons. This can be substantiated by the "activity tracker" icon published in the lower right-hand corner of the web page.

24.

Plaintiffs, under information and belief, do not believe that this was a privileged communication despite an assertion that this was made by an individual identifying himself as "Attorney," as this information was publically available and not made by an individual who is an identified public official subject to immunity under Oregon or Federal Law.

25.

After the two week period which Defendant MerchantCircle had to remove this information from their website or otherwise be subject to general damages under Oregon law, this information is still available, in a different directory online than it was previously posted on, when one performs

a google search through www.google.com. Plaintiffs, under information and belief, assert that Defendant MerchantCircle has effectively republished the statement posted by "Attorney" and made it their own statement by having it appear in a different location than it was originally posted.

26.

As Defendant MerchantCircle is a web site encouraging the posting of reviews of local merchants which adds value to Defendant MerchantCircle's website as a business review service, any immunity it might receive under applicable law is lost as this company profits from the postings themselves.

27.

Under information and belief of Plaintiffs, Plaintiffs have suffered damage to their reputation and business in the following ways:

- A. Potential clients of Plaintiff Keith Goodridge Construction have brought up the posting on MerchantCircle.com;
- B. Plaintiff Keith Goodridge's and Plaintiff Keith Goodridge Construction's reputations in the community have been harmed by this posting;
- C. Plaintiffs have noticed an extreme decrease in the amount of business that Plaintiffs have been able to bid for, let alone obtain;
- D. Plaintiff Keith Goodridge has suffered emotional distress as a result of the defamatory statement by Defendant MerchantCircle;

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- E. Plaintiffs have had to divert a large amount of time and resources to the investigation and prosecution in this claim; and
- F. All damages continue to accrue in an amount to be proven at trial.

28.

As a result of Defendant MerchantCircle's failure to print a retraction in this matter, Plaintiffs request general damages in the amount of \$1,000,000.00.

**SECOND CLAIM FOR RELIEF**

(Defamation: Against Defendants Susan and Anthony Gatchell "Attorney")

**COUNT ONE**

29.

Plaintiffs incorporate paragraphs 1 through 18 and 20 through 28 as if fully incorporated and set forth herein.

30.

As described in paragraph seven (7) above, a posting was made on the Internet by Defendants Susan and Anthony Gatchell "Attorney" on or about June 4, 2008, entitled "Keith Goodridge Construction Unsafe-Caused Death of Teenager," which was discovered by Plaintiffs Keith Goodridge and Keith Goodridge Construction, Inc. on or about July 10, 2008.

31.

Plaintiffs, after the reasonable investigation of the content of the November 21, 2008 posting, entitled "Keith Goodridge Construction Unsafe-Caused Death of Teenager," made by

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Defendants Susan and Anthony Gatchell “Attorney” on the www.MerchantCircle.com web site, Plaintiffs, under information and belief, assert the posting to be false.

32.

Defendants Susan and Anthony Gatchell “Attorney” posted the alleged defamatory statement on www.MerchantCircle.com, an Internet web site that is not password protected and is open to the public. The statement therefore has been published to third persons. This can be substantiated by the “activity tracker” icon published in the lower right-hand corner of the Internet web page.

33.

Under information and belief of Plaintiffs, Plaintiffs have suffered damage to their reputation and business in the following ways:

- A. Potential clients of Plaintiff Keith Goodridge Construction have brought up the posting made by Defendant Susan and Anthony Gatchell “Attorney” on MerchantCircle.com;
- B. Plaintiff Keith Goodridge’s and Plaintiff Keith Goodridge Construction’s reputations in the community have been harmed by this posting of Defendant Susan and Anthony Gatchell “Attorney;”
- C. Plaintiffs have noticed an extreme decrease in the amount of business that Plaintiffs have been able to bid for, let alone obtain;
- D. Plaintiff Keith Goodridge has suffered emotional distress as a result of the defamatory statement by Defendant Susan and Anthony Gatchell “Attorney;”

E. Plaintiffs have had to divert a large amount of time and resources to the investigation and prosecution in this claim; and

F. All damages continue to accrue in an amount to be proven at trial.

34.

Plaintiffs request general damages against Defendants Susan and Anthony Gatchell “Attorney” in the amount of \$1,000,000.00.

COUNT TWO

35.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, and 30 through 34 herein.

36.

As described in paragraph 11 above, a posting entitled, “Keith Goodridge business Sucks!!!” was made on the Internet by Defendants Susan and Anthony Gatchell “Attorney” on or about November 21, 2008, which was discovered by Plaintiffs Keith Goodridge and Keith Goodridge Construction, Inc. on or about December 12, 2008.

37.

Plaintiff’s after reasonable investigation of the content of November 21, 2008 posting, entitled, “Keith Goodridge Business Sucks!!!,” made by Defendants Susan and Anthony Gatchell “Attorney” on the www.MerchantCircle.com website, Plaintiffs, under information and belief, assert the posting to be false.

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38.

Defendants Susan and Anthony Gatchell "Attorney" posted the alleged defamatory statement on www.MerchantCircle.com, an Internet web site that is not password protected and is open to the public. The statement therefore has been published to third persons. This can be substantiated by the "activity tracker" icon published in the lower right-hand corner of the Internet web page.

39.

Under information and belief of Plaintiffs, Plaintiffs have suffered damage to their reputation and business in the following ways:

- A. Potential clients of Plaintiff Keith Goodridge Construction have brought up the posting made by Defendants Susan and Anthony Gatchell "Attorney" on MerchantCircle.com;
- B. Plaintiff Keith Goodridge's, Plaintiff Marjorie Goodridge's and Plaintiff Keith Goodridge Construction's reputations in the community have been harmed by this posting of Defendants Susan and Anthony Gatchell "Attorney;"
- C. Plaintiffs have noticed an extreme decrease in the amount of business that Plaintiffs have been able to bid for, let alone obtain;
- D. Plaintiffs Keith Goodridge and Marjorie Goodridge have suffered emotional distress as a result of the defamatory statement by Susan and Anthony Gatchell "Attorney;"

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- E. Plaintiffs have had to divert a large amount of time and resources to the investigation and prosecution in this claim; and
- F. All damages continue to accrue in an amount to be proven at trial.

40.

Plaintiffs request general damages against Defendants Susan and Anthony Gatchell "Attorney" in the amount of \$1,000,000.00.

COUNT THREE

41.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, and 36 through 40 as if fully incorporated and set forth herein.

42

As described above in paragraph 18, posting was made by Defendants Susan and Anthony Gatchell on the Internet, entitled, "Do You Know These Crooks???," on or about November 21, 2008, which was discovered by Plaintiff Keith Goodridge, Marjorie Goodridge and Keith Goodridge Construction on or about December 12, 2008.

43.

Upon information and belief, the content of the Craigslist post was made by Defendants Susan and Anthony Gatchell on the Craigslist website. Plaintiffs assert that the information that is posted is false.

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44.

Defendants Susan and Anthony Gatchell posted the alleged defamatory statement on Craigslist.com, an Internet website that is not password protected and is open to the public. The statements therefore have been published to a third person.

45.

As a result of Defendants Susan and Anthony Gatchells' failure to print a retraction in this matter, Plaintiffs request general damages in the amount of \$1,000,000.00.

**THIRD CLAIM FOR RELIEF**

(Intentional Infliction of Emotional Distress: Plaintiff Keith Goodridge against Defendant MerchantCircle)

46.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, and 42 through 45 as if fully incorporated and set forth herein.

47.

As a result of the posting described in paragraph seven (7) and its subsequent republication by Defendant MerchantCircle, Plaintiff Keith A. Goodridge has suffered emotional distress in the form of grief, shame, humiliation, embarrassment, anger, chagrin, disappointment, and worry which has physically manifested itself as loss of sleep and a lack of energy.

48.

Plaintiff Keith Goodridge alleges that Defendant MerchantCircle intended to inflict severe mental or emotional distress upon Plaintiff Keith Goodridge by republishing the false statement regarding the death of a teenager in another directory on their web site.



49.

Plaintiff Keith A. Goodridge alleges that the republication by Defendant MerchantCircle that Plaintiff Keith Goodridge was responsible for the death of a teenager and a horse is an extraordinary transgression of the boundaries of socially tolerable conduct and exceeds any reasonable limit of social toleration which has caused Plaintiff severe emotional distress.

50.

Plaintiff Keith A. Goodridge alleges that he is a person of ordinary sensibilities, and that only through the extreme content of these postings has Plaintiff felt severe emotional distress.

51.

Plaintiff Keith A. Goodridge hereby demands \$100,000.00 or damages in the amount to be proven at trial.

**FOURTH CLAIM FOR RELIEF**

(Intentional Infliction of Emotional Distress: Plaintiff Keith Goodridge against Defendants Susan and Anthony Gatchell “Attorney”)

**COUNT ONE**

52.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, and 47 through 51 as if fully incorporated and set forth herein.

53.

As a result of the posting entitled “Keith Goodridge Construction Unsafe-Caused Death of Teenager,” by Defendants Susan and Anthony Gatchell “Attorney” and its subsequent republication by MerchantCircle, Plaintiff Keith A. Goodridge has suffered emotional distress in the form of grief,

shame, humiliation, embarrassment, anger, chagrin, disappointment, and worry which has physically manifested itself as loss of sleep and a lack of energy.

54.

Plaintiff Keith Goodridge alleges that Defendants Susan and Anthony Gatchell "Attorney" intended to inflict severe mental or emotional distress upon Plaintiff Keith Goodridge by publishing the false statement regarding the death of a teenager on www.MerchantCircle.com.

55.

Plaintiff Keith A. Goodridge alleges that the publication by Defendant Susan and Anthony Gatchell "Attorney" that Plaintiff Keith A. Goodridge was responsible for the death of teenager and a horse is an extraordinary transgression of the boundaries of socially tolerable conduct and exceeds any reasonable limit of social toleration which has caused Plaintiff severe emotional distress.

56.

Plaintiff Keith A. Goodridge alleges that he is a person of ordinary sensibilities, and that only through the extreme content of this posting has Plaintiff felt severe emotional distress.

57.

Plaintiff Keith A. Goodridge hereby demands \$100,000.00 or damages in the amount to be proven at trial.

COUNT TWO

58.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, 47 through 51, and 53 through 57.

59.

As a result of the posting by Defendants Susan and Anthony Gatchell on Craigslist entitled "Do you know these crooks?" Plaintiffs Keith Goodridge and Marjorie Goodridge have suffered emotional distress in the form of grief, shame, humiliation, embarrassment, anger, disappointment and worry, which has physically manifested itself as loss of sleep and lack of energy.

60.

Plaintiffs Keith Goodridge and Marjorie Goodridge allege that Defendant Susan and Anthony Gatchell intended to inflict severe mental or emotional distress upon Plaintiffs Keith Goodridge and Marjorie Goodridge by publishing false statements alleging that the Plaintiffs are crooks. It is an extraordinary transgression outside of the boundaries of socially tolerable conduct and exceeds any reasonable limit of social toleration, which has caused Plaintiffs severe emotional distress.

61.

Plaintiffs Keith Goodridge and Marjorie Goodridge allege that they are persons of ordinary sensibilities and that only through the extreme content of this posting have Plaintiffs felt severe emotional distress.

62.

Plaintiffs Keith Goodridge and Marjorie Goodridge each demand \$100,000.00 for damages in an amount to be proven at trial.

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**FIFTH CLAIM FOR RELIEF**

(Tort of Interference with Business Relations: Plaintiff Keith Goodridge Construction against Defendant MerchantCircle)

63.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, 47 through 51, 53 through 57, 59 through 62 as if fully incorporated and set forth herein.

64.

As a result of the Internet posting alleging the death of a teenager against Keith Goodridge Construction and the republication by Defendant MerchantCircle in a different directory of their web site, this information is still visible to the public through google searches, which indicates the intent of Defendant MerchantCircle to induce or otherwise cause third persons not to enter into or continue business relationships with Keith Goodridge Construction.

65.

Whether or not the direct intent of Defendant MerchantCircle's interference with Plaintiff Keith Goodridge Construction's business is produced, it can be inferred from the fact that MerchantCircle (by having more information available on its directory web pages) will receive more "hits" for each part of its web site relating to Keith Goodridge Construction, thereby prioritizing MerchantCircle's business in a search engine and thereby Defendant MerchantCircle obtains a more respectable placement within those search engines, the defamatory postings against Plaintiff Keith Goodridge Construction and Plaintiff Keith Goodridge, have continued to produce benefit for Defendant MerchantCircle.

66.

Plaintiff Keith Goodridge Construction alleges that the actions by Defendant MerchantCircle have in fact reduced Plaintiff Keith Goodridge Construction's business and profitability.

67.

Plaintiff Keith Goodridge Construction alleges that Defendant MerchantCircle has no privilege that can be asserted to interfere with Plaintiff Keith Goodridge Construction's business relations.

68.

As a result of the foregoing, Plaintiff Keith Goodridge Construction has suffered damages in the amount of \$1,000,000.00 or an increased amount to be proven at trial.

**SIXTH CLAIM FOR RELIEF**

(Tort of Interference with Business relations: Plaintiff Keith Goodridge Construction against Defendants Susan and Anthony Gatchell "Attorney")

**COUNT ONE**

69.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, 47 through 51, 53 through 57, 59 through 62, and 64 through 68 as if fully incorporated and set forth herein.

70.

As a result of the posting alleging the death of a teenager against Plaintiff Keith Goodridge Construction by Defendants Susan and Anthony Gatchell "Attorney" which is still

visible to the public through google searches, the clear intent of Defendants Susan and Anthony Gatchell "Attorney" is to induce or otherwise cause third persons not to enter into or continue business relationships with Plaintiff Keith Goodridge Construction.

71.

Whether or not the direct intent of Defendants Susan and Anthony Gatchell "Attorney" interference with Plaintiff Keith Goodridge Construction's business is produced, it can be inferred from the fact that Defendants Susan and Anthony Gatchell "Attorney" has informed the public of a false statement that Plaintiff was responsible for killing a teenager, that Defendant intended to interfere with Plaintiff Keith Goodridge Construction.

72.

Plaintiff Keith Goodridge Construction alleges that the actions by Defendant Susan and Anthony Gatchell "Attorney" have in fact reduced Plaintiff Keith Goodridge Construction's business and profitability.

73.

Plaintiff Keith Goodridge Construction alleges that Defendant Susan and Anthony Gatchell "Attorney" has no privilege that they can assert to forgive interference with Plaintiff Keith Goodridge Construction's business relations.

74.

As a result of the foregoing, Plaintiff Keith Goodridge Construction has suffered damages in the amount of \$1,000,000.00.

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COUNT TWO

75.

Plaintiffs incorporate fully herein paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, 47 through 51, 53 through 57, 59 through 62, 64 through 68, and 70 through 74.

76.

As a result of the posting on MerchantCircle.com of November 21, 2008 alleging that Keith Goodridge's business sucks, this information is still visible to the public through Google searches. The intent of Defendants Susan and Anthony Gatchell, is clearly to induce or otherwise cause third persons not to enter into or continue business relationships with Keith Goodridge Construction.

77.

Whether or not the direct intent of Defendant Susan and Anthony Gatchell's interference with Plaintiff Keith Goodridge Construction's business is produced it can be inferred from the fact that Defendant Susan and Anthony Gatchell have informed the public of false statements that Plaintiff's business sucks, that Defendants Susan and Anthony Gatchell intended to interfere with Plaintiff Keith Goodridge Construction.

78.

Plaintiff Keith Goodridge Construction alleges that the actions by Defendants Susan and Anthony Gatchell have in fact reduced Plaintiff Keith Goodridge Construction's business and profitability.

79.

Plaintiff Keith Goodridge Construction alleges that Susan and Anthony Gatchell have no privilege that they can assert to forgive interference with Plaintiff Keith Goodridge Construction Inc.'s business relations.

80.

As a result of Defendant MerchantCircle's failure to print a retractions in this matter, Plaintiffs request general damages in the amount of \$100,000.00.

COUNT THREE

81.

Plaintiffs incorporate paragraphs 1 through 18, 20 through 28, 30 through 34, 36 through 40, 42 through 45, 47 through 51, 53 through 57, 59 through 62, 64 through 68, 70 through 74, 76 through 80.

82.

As a result of the posting on Craigslist.com of November 21, 2008, "Do you know these crooks?" alleging that Plaintiffs Keith Goodridge and Marjorie Goodridge is still visible to the public through Google searches. The intent of Defendants Susan and Anthony Gatchell, is clearly to induce or otherwise cause third persons not to enter into or continue business relationships with Keith Goodridge Construction.

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83.

Whether or not the direct intent of Defendant Susan and Anthony Gatchell interference with Plaintiff Keith Goodridge Construction's business is produced it can be inferred from the fact that Defendant Susan and Anthony Gatchell have informed the public of false statements that Plaintiff's business sucks, that Defendants Susan and Anthony Gatchell intended to interfere with Plaintiff Keith Goodridge Construction.

84.

Plaintiff Keith Goodridge Construction alleges that the actions by Defendants Susan and Anthony Gatchell have in fact reduced Plaintiff Keith Goodridge Construction's business and profitability.

85.

Plaintiff Keith Goodridge Construction alleges that Susan and Anthony Gatchell have no privilege that they can assert to forgive interference with Plaintiff Keith Goodridge Construction Inc.'s business relations.

WHEREFORE, Plaintiffs pray for relief as follows:

For Plaintiffs' first claim for relief against Defendant MerchantCircle as follows:

1. For economic and non-economic damages of \$1,000,000.00;
2. For an equitable order of the court requiring Defendant MerchantCircle to remove any and all defamatory postings about Keith Goodridge and Keith Goodridge Construction from their web site;
3. For Plaintiffs' reasonable attorney fees;

4. For Plaintiffs' costs and disbursements;
  5. For all other relief the court deems just and proper.
2. For Plaintiffs' second claim for relief against Defendant Susan and Anthony Gathchell "Attorney" as follows:
    1. For economic and non-economic damages of \$1,000,000.00;
    2. For Plaintiffs' reasonable attorney fees;
    3. For Plaintiffs' costs and disbursements;
    4. For all other relief the court deems just and proper.
  3. For Plaintiff Keith A. Goodridge, individually, for his third claim for relief against Defendant MerchantCircle:
    1. For economic and non-economic damages of \$100,000.00;
    2. For an equitable order of the court requiring Defendant MerchantCircle to remove any and all defamatory postings about Keith Goodridge and Keith Goodridge Construction from their web site;
    3. For Plaintiff Keith A. Goodridge's reasonable attorney fees;
    4. For Keith A. Goodridge's reasonable costs and disbursements herein;
    5. For all other relief the court deems just and proper.
  4. Plaintiff Keith A. Goodridge, individually, for his fourth claim for relief against Defendant Susan and Anthony Gathchell "Attorney":
    1. For economic and non-economic damages of \$100,000.00;
    2. For Plaintiff Keith A. Goodridge's reasonable attorney fees;

3. For Plaintiff Keith A. Goodridge's reasonable costs and disbursements herein;
4. For all other relief the court deems just and proper.
5. For Plaintiff Keith Goodridge Construction's fifth claim for relief against Defendant MerchantCircle:
  1. For economic and non-economic damages of \$1,000,000.00;
  2. For an equitable order of the court requiring Defendant MerchantCircle to remove any and all defamatory postings about Keith Goodridge and Keith Goodridge Construction from their web site;
  3. For Plaintiff Keith Goodridge Construction's reasonable attorney fees;
  4. For Keith Goodridge Construction's reasonable costs and disbursements herein;
  5. For all other relief the court deems just and proper.
6. Plaintiff Keith Goodridge Construction's sixth claim for relief against Defendant Susan and Anthony Gatchell "Attorney" as follows:
  1. For economic and non-economic damages of \$1,000,000.00;
  2. For Plaintiff Keith Goodridge Construction's reasonable attorney fees;

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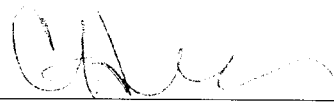
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3. For Plaintiff Keith Goodridge Construction's costs and disbursements;
4. For all other relief the court deems just and proper.

DATED this the 14<sup>th</sup> day of February, 2009.

THE VANDERMAY LAW FIRM



Crystal M. Henry, OSB # 04312  
The VanderMay Law Firm  
388 State Street, Suite 340  
Salem, Oregon 97301  
(503) 588-8053



Goodridge Keith Construction Lebanon, OR

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### Goodridge Keith Construction

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12 Photos

Tags: Home Improvement, Remodeling, Siding, Decks, Patios, Porches, Dry Rot Repair, Pest Control, New Construction, Interior Painting, Exterior Painting

Categories: Home Improvement, Remodeling, Siding, Decks, Patios, Porches, Dry Rot Repair, Pest Control, New Construction, Interior Painting, Exterior Painting

#### CUSTOMER REVIEWS

MerchantCircle

I am not at liberty to disclose all the facts as of this time, so I will share what information I can.  
Keith A Goodridge Construction Manufactured/Built an outdoor arena located in Lebanon, Oregon. There was a teenager riding in the arena and due to lack of proper building materials and lack of solid foundation for the structure it collapsed and the teenager and the horse bumped one of the main beams on the corner of the structure. The teen was killed and the horse struggled free only to be humanely destroyed later due to injuries. Parents of the teenager are seeking an undisclosed amount for obvious reasons.

June 29, 2008 by Attorney

Write a review for Goodridge Keith Construction.

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#### AFFILIATES

Know someone at this business? Send them an invite!

#### RECOMMENDED PROFESSIONALS

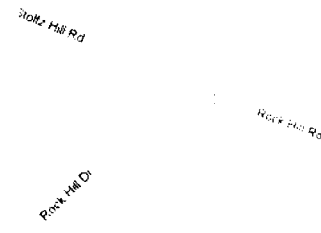
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All Phases: Carpentry, Custom Log & Frame Homes, Design & Drafting Service, New Construction, Remodel...

Customized Framing & Construction

Manufacturing Distribution

Waterway Creek & Mountain Labels

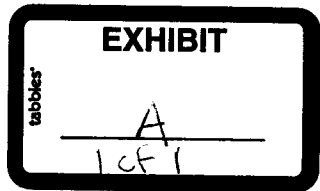
We Manufacture Blank and Custom Printed Plastic Nursery Labels. Labels are .025"(25 mil) thick...

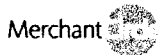
Decorative Supply Inc

#### ACTIVITY TRACKER

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Viewed Profile 10/10/08  
Viewed Profile 10/10/08  
Viewed Profile 10/10/08  
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Help Top OR Lebanon 97355

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We found 1 MerchantCircle review

Reviews found as of July 10, 2008

1 review found for Goodridge Keith Construction  
1 review found for Goodridge Keith Construction

I am not at liberty to disclose all the facts as of this time, so I will share what information I can.

Keith A Goodridge Construction Manufactured/Built an outdoor arena located in Lebanon, Oregon. There was a teenager riding in the arena and due to lack of proper building materials and lack of solid foundation for the structure it colapsed when the teenager and the horse bumped one of the main beams on the corner of the structure. The teen was killed and the horse struggled free only to be humanely destroyed later due to injuries. Parents of the teenager are seeking an undisclosed amount for obvious reasons.

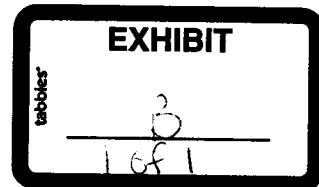
June 04, 2008 by Attorney

Write a review for this merchant.

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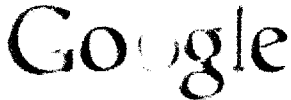
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Results 11 - 20 of about 112,000 for Keith Goodridge. (0.31 seconds)

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www.keithgoodridge.com/keithgoodridgeconstruction/arenas.html - 5k - Cached - Similar pages

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Info powered by MBB YELLOWPAGES.COM Industrial Directory includes company name, address, phone, fax, zip, products, services and maps.  
www.mbb.com/1100-1110/keithgoodridgegroup.cfm?ID=8785 - 27k - Cached - Similar pages

**GOODRIDGE KEITH A, LEBANON, OR on MacRAE'S - Business Info Since 1892**

Info for **GOODRIDGE KEITH A** powered by MBB YELLOWPAGES.COM Industrial Directory includes address, phone, map, . A specialist in CONTRACTORS GENERAL, ...  
www.mbb.com/1100-1110/keithgoodridgegroup.cfm?ID=8785 - 27k - Cached - Similar pages

[PDF] **Summary of Building Valuation Summary of Building Activity**

File Format: PDF/Adobe Acrobat - View as HTML  
**Keith Goodridge.** 700 10th St. 12-2W-10CB-600. \$10000.00 ... **Keith Goodridge.** 979 Wassom St. 12-2W-15CD-1801. \$179287.99. single family ...  
www.keithgoodridge.com/keithgoodridgegroup.cfm?ID=8785 - 27k - Cached - Similar pages

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**Keith Goodridge Construction UNSAFE-caused death of Teenager ... Keith A Goodridge Construction** Manufactured/Built an outdoor arena located in Lebanon, ...  
www.keithgoodridge.com/keithgoodridgegroup.cfm?ID=8785 - 27k - Cached - Similar pages

**Goodridge Keith Construction**

Goodridge Keith Construction Lebanon, corporate profile and product articles.  
www.keithgoodridge.com/keithgoodridgegroup.cfm?ID=8785 - 27k - Cached - Similar pages

**Amazon.com: Yodels: Books**

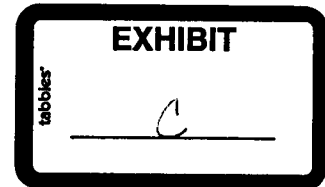
Discovery of the Little Yodel People by R. **Keith Goodridge** and Amy E. **Goodridge** (Paperback - 1995). from \$13.95. Showing 1 - 12 of 4620 Results ...  
www.amazon.com/?pf\_rd\_p=1100-1110-keithgoodridgegroup.cfm?index=books&field-keywords=Yodels&page=1 - 140 - Cached - Similar pages

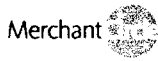
**Golf: Pennell takes top Spoon honours - Buckingham Today**

Jun 25, 2008 ... Three men finished on 66 with Tim Cross taking third spot on countback from **Keith Goodridge** and another junior, Ben Oliver. ...  
www.buckinghamtoday.com/news/sports/2008/06/25/golf-keith-goodridge-takes-top-spoon-honours - 14k - Cached - Similar pages

**Vanderbilt Commodores**

**Keith Edwards**, 1983 2. **Bob Goodridge**, 1967 3. **Boo Mitchell**, 1988 4. **Chuck Scott**, 1983 5. **Brad Gaines**, 1989 6. **Dan Stricker**, 2001 7. **Allama Matthews**, 1982 ...  
www.vanderbilt.com/sports/football/history/reliving.htm - 49k - Cached - Similar pages





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### Goodridge Keith Construction

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Business Hours

Tags: [siding](#) [shops](#) [project design](#) [pole buildings](#) [horse barns](#) [garages](#) [decks](#) [remodels](#) [additions](#) [remodels](#) [porches](#) [pest & dry rot repair](#) [patios](#) [new construction](#) [interior exterior painting](#)

Categories: [Construction](#) | [Home Improvement](#) | [Business Services](#)

#### CUSTOMER REVIEWS

MerchantCircle

There are no reviews for Goodridge Keith Construction. Be the first to review!

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June 04, 2008 by Attorney

Write a Review for Goodridge Keith Construction.

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#### AFFILIATES

Know someone at this business? Send them an invite!

#### LEBANON, OR NEWS

Crash kills Albany motorcyclist  
Sheriff Tim Mueller of Linn County says a motorcyclist died after failing to negotiate a curve on Riverside Drive in Albany. ...  
KAW-TV Herald - Sun, 08 Jun 2008 22:41:40 GMT

Traffic fatalities down in Oregon  
Four people were killed in separate traffic crashes over the long Independence Day weekend. ...  
F107 - Thu, 04 Jul 2008 09:41:53 GMT

Traffic deaths down compared with other Fourth of July  
Police say four people lost their lives on Oregon roads during the Fourth of July weekend - the same number as last year. ...  
KASD-AP News Plus - Thu, 04 Jul 2008 15:51:51 GMT

Business Directory

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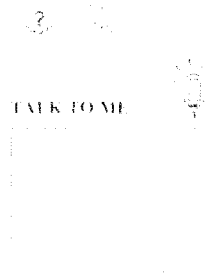
Construction Services

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Septic Tank Replacements, Free Estimates, Sand Filter

Septic Systems, Road Building, Driveways, Util

Local Heavy Hauling, Heavy Hauling Up To 13 Axles



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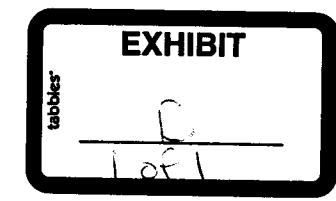
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Activity Tracker

#### ACTIVITY TRACKER

Direct Page Views	25
Yahoo! Direct Views	4
Google Direct Views	2
Total Referrals	1
Total Revenue	1

(Visits in the last 30 days - updated nightly)





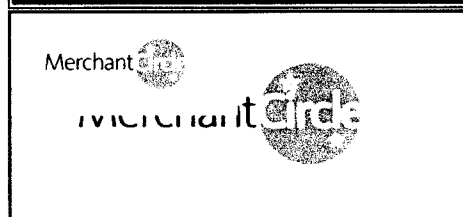
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IN Lebanon, OR

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## No reviews for Goodridge Keith Construction

**Did you know that 77% of online shoppers use reviews and ratings when purchasing online?\***

Thanks for taking the time to check on the status of your online reviews. MerchantCircle does not currently have any active reviews for **Goodridge Keith Construction** in Lebanon, OR.

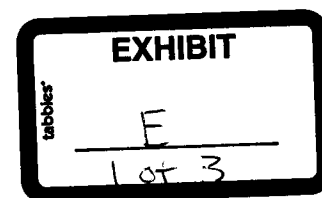
We constantly monitor all listings and remove any obscene, harassing or inappropriate reviews. We aggregate reviews from all over the web from sites like Citysearch, Yahoo! Local, Yellow Pages and more. Sometimes it can take up to a week for new reviews to appear on your listing. !

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\* according to a study by Jupiter Research, August 2006

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Activity Tracker

Great! Great reviews!  
 (Visits in the last 30 days - updated nightly)

10 reviews

Tags: remodeling, painting, siding, events

Categories: Home & Garden | Improvement, Renovation | Service - General

MerchantCircle

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Architectural Builders Inc Inc

B & W Construction, LLC Inc

Remodeling & Maintenance, Commercial & Residential, Building

Don Valley Building Supplies Inc

D & B Builders, a Commercial Inc

Tile, Sheet Rock, Remodeling, Pole Barns, Custom Homes, Commercial & Residential

Benton County official looks to 2009

Benton County Commissioner Jay Dixon says he's making a list of things he'd like the county to accomplish or at least tackle in 2009. ...

Oregonian-Gazette-Times - Thu, 25 Dec 2008 06:17:44 GMT

Eight girls attempt escape from facility

Three Oregon Youth Authority staff members sustained minor injuries during an escape attempt by eight girls at Oak Creek Youth Correctional Facility in Albany early Sunday. ...

Statesman Journal - Mon, 22 Dec 2008 12:48:27 GMT

Exhibit

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Keith Goodridge

Albany, OR

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541-258-8920

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### CONSUMER REVIEWS

Average on MerchantCircle

We found 2 MerchantCircle reviews

Reviews found as of July 05, 2008

#### KEITH GOODRIDGE CONSTRUCTION

I am the neighbor who had the barn built. Actually it was an addition to a barn that we were building ourselves. It is a small exercise arena that we use. We are not unhappy with the work performed. We bought a horse from them in 2005 and asked to have the Arab mare as a companion to the horse we bought. It was not due to them not being able to care for her. I have seen her stallions and they have very beautiful studs. They did remodel work for us when we first came over to take care of my husband's parents estate and did beautiful job. If you check prices of most construction I believe you will find that they are charging similar amounts as other contractors.

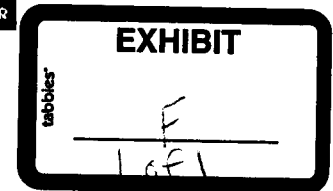
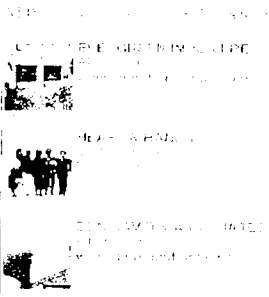
Updated on 07/05/08 by Keith Goodridge

#### KEITH GOODRIDGE BUSINESS SUCKS!

Keith & Marg Goodridge screwed me over and I lost lots of money which will never be seen again. They are as crooked as they come. Their work is not safe, not fair and very high priced. They are so crooked they passed off an old raggy, nasty looking half breed arabian horse to thir neighbors because they could not take care of it and feed it right. They have some of the ugliest horses ever by the way. Their neighbor had a barn built and they tried to over charge her and the barn is built very weak and nothing more then a lean to with studs for a huge amount of money. I would not suggest anyone do business with them.

Updated on 07/05/08 by Keith Goodridge

Click to review for this merchant.  
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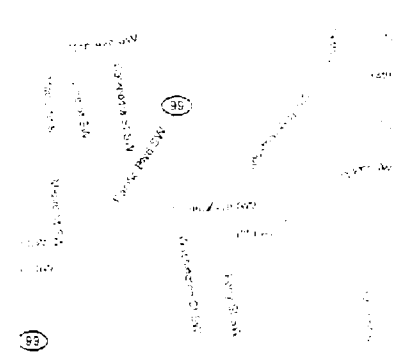
Keith Goodridge

Albany, OR

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Total Pest Control



**Total Pest Control**

1720 Ferry St SW  
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**MERCHANT INFORMATION**

Tags: contractors general albany

Categories: Home & Garden | Home Repair & Improvement | General Contractors

**CUSTOMER REVIEWS**

MerchantCircle

**KEITH GOODRIDGE CONSTRUCTION**

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December 11, 2008 by Susan Holander in Lebanon, OR

**KEITH GOODRIDGE BUSINESS SUCKS!!**

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November 21, 2008 by [redacted] in Albany, OR

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**ELDRISTRIA SWEET**  
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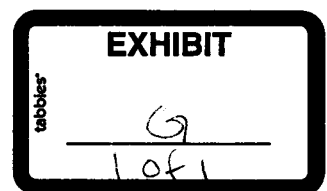
**Gift World**

*Gift World opened its doors on July 15, 2008. Since then we have made 3 moves to allow space for th*

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Write Reviews	1
Complete Profile	2
Verify Ownership	2
Get Reviews	2
Get Reviews	2

*(posts in the last 30 days - updated nightly)*





1A.



# Goodridge Keith Construction

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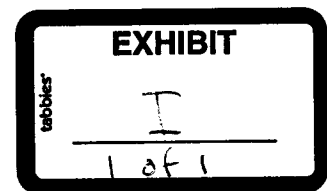
Hello! Goodridge Keith Construction is in business in Lebanon, OR, and is interested in doing business with you. Contact Goodridge Keith Construction to request a deal, get a coupon or to do business. (3) (4)

You can visit Goodridge Keith Construction at:  
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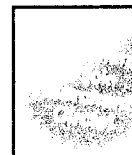
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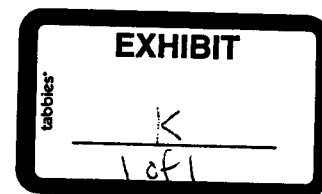
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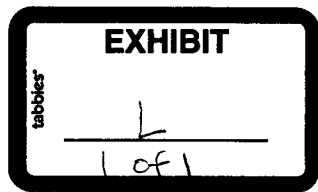
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# Do you know these CROOKS????

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Reply to: comm-928512037@craigslist.org  
Date: 2008-11-21, 10:54AM PST

So, this is my first time posting on CL, so I will try to write all the information in this single posting. The people who are crooks are, or known as: Keith Goodridge Construction, or Marg Goodridge, or Keith & Marg Goodridge.

So years back, we had rented a house with them, but they (MARG) was acting as an agent (so called anyways) for a guy in california. So it was myself, my husband and our toddler and newborn. So we rented the house, paid the deposits, even paid extra deposits for our outside 2 outside dogs.

So, we did inspect the property prior to moving in and all the following is TRUE & ACCURATE:

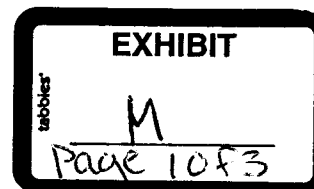
- \*The wallpaper was torn in several places (Marg said she would have it fixed)
- \*The ceiling fan did not work (Marg said she would have it fixed)
- \*The heater ducts under the house were chewed up from previous renters dogs--this is what Marg herself told me) Marg said it would be fixed.
- \*The garbage disposal was broken (Marg said she would have it fixed)
- \*The carpet STUNK SO BAD from the previous renters--no way in HELL I was going to have my kids playing on the floor (marg said it would be cleaned, or replaced)
- \*The previous renters obviously did not watch their kids, because there was crayons markings ALL OVER the walls (Marg said it would be painted over)
- \*The front porch was a safety hazard (Marg said it would be replaced)
- \*The yard and entire surrounding 12 acres were scattered with garbage from the previous renters: I'm not talking typical clean bags filled with garbage...I'm talking about dirty diapers, household garbage, animal debri (bones, chew toys, feces, old broken dog collars/leashes etc.) So much garbage that it filled a blue dumpster (5 yards I think) just from the yard. (Marg said she would have all this cleaned up).

So here is my issue: We decided to move in, knowing what condition the house was in, because it was winter time and we needed a place to stay, but we knew exactly what Marg had told us and we KNEW she really would repair, replace and clean the place up because she said she would. Yeah right...to our surprise the ONLY thing fixed was the steps out BACK (not even the steps that were in bad shape and unsafe!!) So, we tried and tried to clean the place up ourselves, because there surely was no response from both Marg and Keith Goodridge to get the things taken care of. We did this on our own time. The only thing we did not fix or replace was the wallpaper, simply because I was never able to get a return call from Marg to discuss what style of wall paper to replace the old with. EVERYTHING else we fixed ourselves...we even built a FREAKIN barn with our own money (yes, we did tear it down and take it with us).

So we lived there for a few years, and we eventually had to move out due to expanding family. I made it

<http://corvallis.craigslist.org/vnn/928512037.html>

12/12/2008



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known to Keith and Marg that we were moving out and gave the dates we were planning to start and the approx. date we would be out by, and asked that they return the deposit to us.

We started packing our belongings and we had several remaining boxes filled with our home electronics, video tapes (of my babies-which I will never get back, or be able to replace or share with them when they are older), video camera...total value of things were roughly then around \$5,000.00, although no value could ever be put on the tapes of my babies :-)

I contacted Marg and Keith and told them we were mainly moved out, but had a few remaining items to pick up. They returned the deposit, and when we went back to get our items, they were GONE, and the KEY to the house would not work, and we still had almost 2 weeks before we should have been out of the place and yes we were paid up until then...but still we find the locks changed...so we had to crawl in through a window (my husband did, because a pregnant woman would look a little odd:-) We were both baffled, and even more shocked to find our items gone. We blew it off at that time as a misplaced box perhaps, or maybe a load that someone else had hauled for us. We checked everything and all the boxes and upon unpacking everything, they were indeed stolen by Marg and Keith Goodridge. So the KICKER: Get this---pretty amazing!!!!

We received our deposit back and a thank you note for renting with us, and hope life is great and good luck with the new baby, and thank you for taking such good care of the property and house and blah blah...THEN check this out!!!! We get sued for destroying the house!!!! I mean really what the hell is that about...we were floored! We were being sued for the damages that the previous renters had done to the place/property! So, Marg claimed to have photos of before and after we moved in: The photos of the BEFORE were in fact AFTER my husband and I had replaced or repaired everything. The photos of the after we had moved out were from BEFORE we had even moved in...all the damage done from the previous renters. WHAT A CROOK!!!! So we got sued for 7,000.00 worth of damage...I contacted the court at the time, even sent doctors letters saying that I was having a hard pregnancy and that I was not allowed (as instructed by doctors) to be under any stress--stress that comes from a lawsuit of this nature. Little did my husband or I know that just as the doctors instructed, the stress just from dealing with this situation was too much to deal with. The court date came and went..as I lay in bed from having a miscarriage. As soon as I was able to, I contacted the courts and explained my situation, and they had the nerve to tell me that I should have contacted them sooner. I was pisted, crushed, furious, sad, upset...a full bottle of emotions. Then they had the nerve to tell me that the court had ruled as a default judgement in Marg and Keith Goodridges favor----So they got a judgement against my husband and myself for us not showing up to court due to me laying in bed after having a miscarriage...what is this world coming to?

And I told myself, ok we can sue them for stolen property, but then I thought what proof do we have...not much, and since she had a judgement against us as it was, she would probably bring that up in my case against her.

So we bought a house about 5 years after having the judgement against us, which we refused to pay, and Marg & Keith nevered attempted to garnish wages, bank accts. etc. At that point all they had was a judgement and they were not trying to collect on it, so we thought it had fallen into the cracks of the earth or perhaps they knew just how wrong they were for doing that to us--two hard working, family devoted people who would surely do anything for anyone...but NO....we bought our house, and the mortgage broker said they would need to be paid off in order to get the house. So to our dislike, we knew we had to pay them in order to move foward with our lives, and keep our fingers crossed that someone would screw them over just as they screwed us over (not to mention in the worst of times for us due to losing a baby).

So we paid them off with CASH in hand--I personally delivered it to Marg & Keith...Keith was outside trying to do what he thinks he does best (construct things--yeah right), and Marg was---get this: very polite and she had the nerve to ASK ME to train her horses for her!!! What a joke!! I was in a state of shock, and paid and walked away without even thinking about it. Its almost as if she was trying to make me feel uneasy at their place...but I had an important matter to tend to, which I did (paid her crooked ass off), and drove away never looking back.

So my husband and I were so glad to have that off our credit report..which it did, and I sent Marg a letter to file a satisfactory of judgement letter to the courts....she NEVER DID (we just found this out about 5 months ago). It is still listed with the courts as unsatisfied judgement against us). Ok...its gets even more nuts!!!! 6 years AFTER I PAID THEM off, we get a default of judgement letter from a collection agency. Marg & Keith Goodridge are claiming that we owe them another freaking 7,500.00 for the SAME damn judgement amount!! But the courts were Marg VS. my husband and I, and now the letter from the collection agency is: Keith Goodridge Construction and Marg Goodridge VS. my husband and I...and they claim to have post judgement interest added. This all started 8 years ago, so the only thing we can think of is that since they know it is set to expire from the courts within 9 years, they are trying to get us again, because they know that I was young and dumb and too upset that day I paid them to get some sort of proof. This was hard earned money that my husband and I worked overtime to earn for the house we bought...we used part of our down payment at the time just to pay them off and be able to buy a house, even knowing that we would have higher payments then we should (due to the lack of the extra down payment money we used to pay them off). So we are at a loss as to what to do at this point..so any information or suggestion you can share would be greatly appreciated.

We have PAID this debt that we DID not even have anything to do with, and we have FIXED the house that we rented--and left it 100 times nicer then when we moved in. We do have people who will vouch for us as to what we did to the property, nd people who helped us repair, replace or pick up garbage. Te BONUS KICKER IS; The video camera stolen by Marg and Keith Goodridge was the PROOF to the pudding you might say; It had video of the property before we moved in, and about 3 weeks before we moved out (because we celebrated a birthday party). We are really reaching out to anyone who can help us with advice, because we have gotten 3 letters so far from the collection agency, or they wil garnish our wages/bank accts.

If you have had any dealing with Keith Goodridge Construction in Lebanon, OR, or Marg Goodridge in Lebanon, OR I'd like to hear your stories. They live in Lebanon at: 36750 Rock Hill Drive Lebanon, Oregon, Marg breeds Arabian Horses (mainly polish or eygptian lines), and last I knew marg Goodridge was a realtor in Lebanon, OR. working at Lebanon Real Estate. Keith A. Goodridge appears to have passed his Home Inspectors Course, and is currently a Certified Home Inspector (watch our home buyers--he could just steal your money and leave you with a clean inspection report on the house you want to buy, and not tell you the truth of any possible issues with the house). This is a Contractor/home inspector who repaired the WRONG steps, and left the UNSAFE ones in there for us to replace!! The previous property address that was rented is: 42244 Upper Berlin Road in Lebanon, Or. 97355. It is a blue Manufactured Home, with a white shed type building in the pasture below. Marg Goodridge drives a Blue Ford Escort station wagon, and Keith Goodridge drives a Contruction looking Truck. They are both English (came from England), and I know they still have a daughter who lives in England. Marg and Keith Goodridge are about in their 50's. Marg Goodridge is as crooked as they come, and I'm sure she will meet the devil in the face when even he refuses her entry into HELL---and even hell is too nice of a place for her!!

Here is a link to Marjorie Goodridge real estate company information:

[http://www.oregon.cc/agent\\_profile.php/4656](http://www.oregon.cc/agent_profile.php/4656)

(P.S. to buyers and Sellers--She has done something like this to us, as renters, so be aware of what could happen if you work with her as your buying or selling agent). She could have Keith (her husband) sugar coat that house you want to buy by inspecting it himself,just so they can get the profits at closing...or anything else they can manage to come up with to screw one more person over.

Here is a link to Keith A Goodridge Construction:

<http://goodridgeconstruction.com/>

READ the REVIEWS for yourself:

<http://www.merchantcircle.com/business/Goodridge.Keith.Construction.541-258-8920>

\*\*\*\*SCROLL DOWN TO MID PAGE AND READ WHAT THE LAWYER WROTE\*\*\*\*

<http://corvallis.craigslist.org/vnn/928512037.html>

12/12/2008

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