

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**DEBORAH R. DOLEN aka Author
“Mabel White”
Plaintiff,**

v.

**JULIE RYALS aka THE DESIGN
SHOPPE, & JANE DOE LIBEL
CYBERSTALKER
Defendants.**

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Civil Action No.: 8:09-cv-02120-SDM-AEP

Judge: Steven D. Merryday

JURY DEMANDED

**DEFENDANT JULIE RYALS’
ANSWER AND COUNTERCLAIMS**

Defendants Julie Ryals (hereafter referred to as “Defendant” and/or “Ryals”) files this, her Answer to Plaintiff Deborah Dolen’s (hereinafter “Plaintiff” or “Dolen”) Second Amended Complaint and Counterclaims.

I. ANSWER

1. Ryals admit that, to the extent that any claim has been stated under the Lanham Act, this Court has jurisdiction, but denies the remainder of the allegations of paragraph 1 of the Second Amended Complaint. Additionally, Ryals specifically denies the allegations I the introductory paragraph that “Deborah Dolen” is a common law trademark, that Ryals is known as “Larry Anderson”, “Mary W.” and/or “Chef” and that Ryals is an owner of the domain name or website identified as BustedScammers.com.

2. Ryals specifically denies that any damages exceed \$75,000.00 and further denies that Ryals has caused any damages to plaintiff. Ryals generally denies the remainder of the allegations contained in paragraph 2 of the Second Amended Complaint.

3. Ryals admits the allegations contained in paragraph 3 of the Second Amended Complaint as they relate to venue being proper and Ryals residing and working in the Middle District of Florida. On information and belief, Ryals admits the allegations regarding Plaintiff residing in the Middle District of Florida at the time the Second Amended Complaint was filed, but would deny it at the time the Original Complaint and the First Second Amended Complaint were filed.

4. On information and belief, Ryals admits that Plaintiff refers to herself as Deborah Dolen and Mabel White, that plaintiff was a resident of Brazoria County, Texas when she filed this case and that she is currently a resident of Manatee County, Florida as alleged in paragraph 4, but denies the remainder of the allegations contained in paragraph 4, including specifically that there are any actionable causes against Ryals in this case..

5. Ryals admits she is a resident of New Port Richey, Pasco County, Florida and owns TheDesignShoppe.com, MomPack.com, and DIYShoppes.com and conducts business via the internet as alleged in paragraph 5, but denies the remainder of the allegations contained in paragraph 5 of the Second Amended Complaint.

6. On information and belief, Ryals denies the allegations in Paragraph 6 of the Second Amended Complaint. Moreover, Dolen's allegation that she sells website space and design is believed to be either untrue or a new line for Dolen, who previously listed only "crafty" things like soaps and lotions.

7. On information and belief, Ryals denies the allegations in Paragraph 7 of the Second Amended Complaint.

8. Ryals admits that some of the characteristics listed in paragraph 8 of the Second Amended Complaint may be applicable to some of Ryals' customers. More particularly, while

the demographics listed are for Ryals' MomPack.com business, which is a non-profit organization that does not sell any products but rather is a support group for stay at home mom businesses, the demographics do not comport with the clients of Ryals' TheDesignShoppe.com business, which is a web design, web hosting and domain registration business or with Ryals' DIYShoppes.com business, which only sells a shopping cart license to those that want to add a shopping cart to their own web site. Ryals denies that Plaintiff's customers and Defendant's customers are the same as alleged in Paragraph 8 of the Second Amended Complaint in that Ryals' customers are generally stay at home moms who have their own businesses while Plaintiff has been expressly and judicially barred by the FTC from aiding any such businesses. Ryals denies the remainder of the allegations in Paragraph 8 of the Second Amended Complaint.

9. Ryals admits that she is and at all pertinent times hereto has been the owner of TheDesignShoppe.com, DIYShoppes.com, and MomPack.com as alleged in paragraph 9 of the Second Amended Complaint, but denies the remainder of the allegations in Paragraph 9 of the Second Amended Complaint.

10. Ryals admits that she is the owner, founder and sole operator of DIYShoppes.com as alleged in paragraph 10 of the Second Amended Complaint, but denies the remainder of the allegations in Paragraph 10 of the Second Amended Complaint, including specifically the suggestion that DIYShoppes.com infringes upon the rights of any party.

11. Ryals denies the allegations in Paragraph 11 of the Second Amended Complaint.

12. Ryals admits that, as an authorized ICANN registrar, she registered the domain name www.bustedscammers.com on behalf of the owner of that domain name and website and listed herself as the "Registrant" and "Technical Contact" to facilitate the registration process, avers that she informed the owner that this information needed to be updated and corrected and

provided the owner with the information necessary to take care of that task, and denies the remainder of the allegations in Paragraph 12 of the Second Amended Complaint

13. Ryals denies the allegations in Paragraph 13 of the Second Amended Complaint.

14. Ryals denies the allegations in Paragraph 14 of the Second Amended Complaint

15. Ryals denies the allegations in Paragraph 15 of the Second Amended Complaint

16. Ryals denies the allegations in Paragraph 16 of the Second Amended Complaint

17. Ryals denies the allegations in Paragraph 17 of the Second Amended Complaint

18. Ryals denies the allegations in Paragraph 18 of the Second Amended Complaint

19. Ryals denies the allegations in Paragraph 19 of the Second Amended Complaint

20. Ryals denies that a Mompack.com newsletter dated 09/01/06 announced BustedScammers as a new MomPack member and published BustedScammer.com's statement of purpose. Ryals admits that www.mompack.com/news.htm, a single web page on the mompack.com website, announced BustedScammers as a new MomPack member and published BustedScammer.com's statement of purpose on or about 09/01/06, but denies the remainder of the allegations in Paragraph 20 of the Second Amended Complaint

21. Ryals denies the allegations in Paragraph 21 of the Second Amended Complaint

22. Ryals denies the allegations in Paragraph 22 of the Second Amended Complaint

23. Ryals denies the allegations in Paragraph 23 of the Second Amended Complaint

24. On information and belief, Ryals avers that the bustedscammers.com website content would provide information and links to the sources of the information regarding persons or businesses so that potential customers could determine if they wished to trust or do business with the featured businesses. On information and belief, Ryals further avers that the intent of the website owner was to act as an information clearinghouse, much like a Better Business Bureau

type organization, focused on businesses that the owner believed would negatively impact the stay and home moms with businesses community. On information and belief, Ryals denies that the owner of Bustedscammers.com intended to or in fact did cause any unwarranted emotional or financial harm to any of the businesses featured by them, the harm, if any, being caused by the conduct of the featured business. Ryals denies the remainder of the allegations in Paragraph 24 of the Second Amended Complaint

25. Ryals avers that the domain name BustedScammers.com is suggestive of the type of content that the owner intended to and did publish, but denies the remainder of the allegations in Paragraph 25 of the Second Amended Complaint

26. On information and belief, Ryals denies the allegations in Paragraph 26 of the Second Amended Complaint

27. On information and belief, Ryals admits that bustedscammers.com is not a blog, but denies the remainder of the allegations in Paragraph 27 of the Second Amended Complaint

28. Ryals denies the allegations in Paragraph 28 of the Second Amended Complaint that Ryals proclaimed anything on bustedscammers.com, admits that bustedscammers.com proclaims that it is intended to provide “information to help you protect yourself from getting yourself involved with a scammer”, is without sufficient information to form a belief regarding wither the bustedscammers.com motto is found on every Google search for Busted Scammers, and denies that bustedscammers.com acts as a designation of origin at all, much less a false one as alleged in paragraph 28 of the Second Amended Complaint.

29. On information and belief, Ryals admits that bustedscammers.com is selective in nature, publishing only verifiable information regarding persons and businesses which are advertising within the stay at home mom run business community which the owner of

bustedscammer.com believes to be a threat to commit fraud on other members of the community. Ryals further avers that, on information and belief, bustedscammers.com actions are no different in that regard that the Better Business Bureau, which currently notes that Deborah Dolen, posing as Mabel White Home Living, has been assigned an F rating by the Better Business Bureau. Ryals is without sufficient information to form a belief regarding the remainder of the allegations in Paragraph 29 of the Second Amended Complaint except to the extent that the website is believed to provide researched and accurate news information regarding the businesses it selects.

30. Ryals admits that the words “Please feel free to select, copy and paste any of the following image links and place them on your website to show your continued support!” <http://www.bustedscammers.com/linktous.htm>” appear on the bustedscammers.com website as alleged in paragraph 30 of the Second Amended Complaint. On information and belief, Ryals admits that bustedscammers.com encourages the stay at home moms with businesses to circulate information regarding potential threats and generally encourages persons to publicize the existence of the bustedscammers.com website. Ryals denies that bustedscammers.com’s use of the work “Alert” is not legitimate or constitutes any designation of origin, much less a false one. Ryals is without sufficient information to form a belief regarding the remainder of the allegations in Paragraph 30 of the Second Amended Complaint.

31. Ryals denies the allegations in Paragraph 31 of the Second Amended Complaint.

32. Ryals denies the allegations in Paragraph 32 of the Second Amended Complaint.

33. Ryals denies the allegations in Paragraph 33 of the Second Amended Complaint.

34. Ryals admits reporting a customer to bustedscammers.com and questioning what could be done about non-payment by the customer. Ryals further admits that she shared the email correspondence between Ryals and her customer with bustedscammers.com as part of

bustedscammers.com's investigation and that bustedscammers.com posted the story shown in Exhibit F of the Second Amended Complaint as alleged in Paragraph 34 of the Second Amended Complaint. Ryals further avers that she requested that the story be removed and that Bustedscammers.com complied with that request. Ryals denies the remainder of the allegations in Paragraph 34 of the Second Amended Complaint.

35. Ryals denies the allegations in Paragraph 35 of the Second Amended Complaint.

36. Ryals denies the allegations in Paragraph 36 of the Second Amended Complaint.

37. Ryals denies the allegations in Paragraph 37 of the Second Amended Complaint.

38. Ryals denies the allegations in Paragraph 38 of the Second Amended Complaint.

39. Ryals denies the allegations in Paragraph 39 of the Second Amended Complaint.

40. Ryals denies the allegations in Paragraph 40 of the Second Amended Complaint.

41. Ryals denies the allegations in Paragraph 41 of the Second Amended Complaint.

42. Ryals avers that clicking on the link http://www.bustedscammers.com/deborah_dolen..htm would take the person clicking the link to http://www.bustedscammers.com/deborah_dolen..htm, as shown in the exhibits filed with the First Amended Complaint, namely the printout of http://www.bustedscammers.com/deborah_dolen..htm. Since the page exists, a redirect as alleged by Dolen was clearly not possible. Ryals further admits that http://www.bustedscammers.com/deborah_dolen..htm contained content regarding Plaintiff and links to news stories regarding Plaintiff's history of contact with the legal system. Ryals denies the remainder of the allegations in Paragraph 42 of the Second Amended Complaint

43. Ryals admits that there may have been banner advertisements for MomPack.com on the bustedscammers.com website pages, particularly since Mom Pack members are required

to put Mom Pack buttons on their sites when they join Mom Pack, which is otherwise free to join. Ryals is without sufficient information to form a belief as to whether such banner advertisements were on the specified website at any given time and therefore denies the same. Ryals denies the remainder of the allegations in Paragraph 43 of the Second Amended Complaint

44. Ryals denies the allegations in Paragraph 44 of the Second Amended Complaint.

45. Ryals admits that the allegations on BustedScammers.com include, with links to newspaper articles confirming the allegations, that Plaintiff is “an admitted prostitute” and that Plaintiff “was convicted of using the money she stole from a charity for crippled children on luxury cars and a home.” On information and belief, those statements are substantially true and accurately reflect the content on the cited newspaper articles. Additionally, on information and belief, bustedscammers.com did present evidence of Plaintiff’s various arrests. Ryals is without sufficient information to form a belief as to the remainder of the allegations contained in Paragraph 45 and therefore denies the allegations in Paragraph 45 of the Second Amended Complaint.

46. Ryals avers that Plaintiff filled out a help ticket on-line at TheDesignShoippe.com, and admits that Ryals wrote back saying that Ryals did not own bustedscammers.com, but denies the remainder of the allegations in Paragraph 46 of the Second Amended Complaint.

47. Ryals denies the allegations in Paragraph 47 of the Second Amended Complaint.

48. Ryals denies the allegations in Paragraph 48 of the Second Amended Complaint.

49. Ryals denies the allegations in Paragraph 49 of the Second Amended Complaint and expressly notes that the alleged URL listed by Dolen is not an acceptable url since it includes characters which accepted internet protocols expressly do not allow.

50. Ryals denies the allegations in Paragraph 50 of the Second Amended Complaint.

51. Ryals denies the allegations in Paragraph 51 of the Second Amended Complaint.

52. Ryals denies the allegations in Paragraph 52 of the Second Amended Complaint.

53. Ryals denies the allegations in Paragraph 53 of the Second Amended Complaint and specifically avers that it is impossible for Dolen's holiday season sales to be down by \$42,000 when her sworn statement in her recent bankruptcy indicates that she had total earnings of only \$35,000 in the full three years prior to filing the bankruptcy.

54. Ryals denies the allegations in Paragraph 54 of the Second Amended Complaint.

55. Ryals denies the allegations in Paragraph 55 of the Second Amended Complaint and specifically avers that the bustedscammers.com supporter button is simply in the footer of the mompack.com site so that it will show on each page. Ryals thus avers that there is a single link-back that shows on each of the 230 mompack.com pages, not multiple link-backs as alleged by Dolen.

56. Ryals denies the allegations in Paragraph 56 of the Second Amended Complaint.

57. Ryals is without sufficient information to form a belief as to the veracity of the allegations and therefore denies the allegations in Paragraph 57 of the Second Amended Complaint.

58. Ryals denies the allegations in Paragraph 58 of the Second Amended Complaint.

59. Ryals denies the allegations in Paragraph 59 of the Second Amended Complaint

60. Ryals denies the allegations in Paragraph 60 of the Second Amended Complaint.

Ryals further avers that the phrase "Google Deborah Dolen Fraud" has been on a third party craft server site since at least 2004 and, on information and belief, that listing is far more likely to be

the basis for the Google search engine's high ranking of the term fraud with plaintiff's name than anything else.

61. Ryals denies the allegations in Paragraph 61 of the Second Amended Complaint

62. Ryals denies the allegations in Paragraph 62 of the Second Amended Complaint

63. Ryals denies the allegations in Paragraph 63 of the Second Amended Complaint

64. Ryals denies the allegations in Paragraph 64 of the Second Amended Complaint

65. On information and belief, "Deborah Dolen" is neither used as trademark nor protectable as a trademark as alleged in Paragraph 65 of the Second Amended Complaint. Ryals admits that plaintiff has used "Mabel White" as a pseudonym and as part of one or more trademarks and thus may have established trademark rights in "Mabel White", but is without sufficient information to form a belief as to the goods or services which have been identified with that mark, if any. Ryals denies that the domain names cited establish trademark rights of any kind. Ryals further denies that plaintiff's business has the same demographics as Ryals' businesses. Ryals denies the remainder of the allegations in paragraph 65 of the Second Amended Complaint.

66. Ryals denies the allegations in Paragraph 66 of the Second Amended Complaint.

67. Ryals denies the allegations in Paragraph 67 of the Second Amended Complaint.

68. Ryals denies the allegations in Paragraph 68 of the Second Amended Complaint.

69. Ryals denies the allegations in Paragraph 69 of the Second Amended Complaint.

70. Ryals denies the allegations in Paragraph 70 of the Second Amended Complaint

71. Ryals denies the allegations in Paragraph 71 of the Second Amended Complaint

72. Ryals denies the allegations in Paragraph 72 of the Second Amended Complaint

73. Ryals denies the allegations in Paragraph 73 of the Second Amended Complaint and specifically avers that it is impossible for Dolen to have lost \$62,800 as alleged if her sworn statement in her recent bankruptcy that she had total earnings of only \$35,000 in the full three years prior to filing the bankruptcy was truthful.

74. Ryals denies the allegations in Paragraph 74 of the Second Amended Complaint

75. Ryals denies the allegations in Paragraph 75 of the Second Amended Complaint

76. Ryals denies the allegations in Paragraph 76 of the Second Amended Complaint

77. Ryals denies the allegations in Paragraph 77 of the Second Amended Complaint

78. Ryals denies the allegations in Paragraph 78 of the Second Amended Complaint.

79. Ryals denies the allegations in Paragraph 79 of the Second Amended Complaint.

80. Ryals denies the allegations in Paragraph 80 of the Second Amended Complaint.

81. Ryals denies the allegations in Paragraph 81 of the Second Amended Complaint.

82. Ryals denies the allegations in Paragraph 82 of the Second Amended Complaint.

83. Ryals denies the allegations in Paragraph 83 of the Second Amended Complaint.

84. Ryals denies the allegations in Paragraph 84 of the Second Amended Complaint.

85. Ryals denies the allegations in Paragraph 85 of the Second Amended Complaint.

86. Ryals denies the allegations in Paragraph 86 of the Second Amended Complaint.

87. Ryals denies the allegations in Paragraph 87 of the Second Amended Complaint.

88. Ryals denies the allegations in Paragraph 88 of the Second Amended Complaint.

89. Ryals denies the allegations in Paragraph 89 of the Second Amended Complaint.

90. Ryals denies the allegations in Paragraph 90 of the Second Amended Complaint.

91. Ryals denies the allegations in Paragraph 91 of the Second Amended Complaint.

92. Ryals denies the allegations in Paragraph 92 of the Second Amended Complaint.

93. Ryals denies the allegations in Paragraph 93 of the Second Amended Complaint.

94. Ryals denies the allegations in Paragraph 94 of the Second Amended Complaint.

95. Ryals denies that there is any basis in law or fact for any of the relief requested in the various Prayers contained in the Second Amended Complaint.

II. AFFIRMATIVE DEFENSES

96. Ryals denies that there is any basis in law or fact for any of the relief requested. Ryals incorporates the statements of the foregoing paragraphs 1-95.

III. COUNTERCLAIMS

97. Ryals incorporates the statements of the foregoing paragraphs 1-97.

98. Ryals is an individual residing in Florida.

99. The Court has jurisdiction over these counterclaims under 28 U.S.C. §§ 1338(a), 2201 and 2202

Facts common to Counterclaims.

100. Except as noted below, each of the following factual allegations are made with respect to events which occurred on or after January 27, 2009 and thus are not barred or otherwise affected by Dolen's bankruptcy filed on January 26, 2009.

101. In paragraph 32 of the Amended Complaint, which was deleted from the Second Amended Complaint, Dolen asserted that Ryals infringes upon a copyright owned by Dolen. Dolen has not sought or obtained a copyright registration as required to maintain a cause of action for copyright infringement.

102. Plaintiff Deborah Dolen has used various aliases to post disparaging remarks regarding Ryals on several websites, including without limitation the Topix website that Plaintiff complains of.

103. Plaintiff Deborah Dolen has used various aliases to post personal identifying information regarding Ryals on at least the Topix website that Plaintiff complains of, including their names, addresses and phone numbers and other identifying information which is not generally known to the public. Topix has removed some of that information, but not all of it.

104. Plaintiff Deborah Dolen has used various aliases to post allegations regarding Ryals on at least the Topix website that Plaintiff complains of which are false, misleading and both libelous and slanderous to Ryals.

105. Plaintiff Deborah Dolen, prior to filing this action (and thus prior to filing her bankruptcy), called and otherwise corresponded with Ryals' staff and customers and threatened and was otherwise verbally abusive to them.

Injunctive Relief

106. Until and unless enjoined by the Court, it is likely that Deborah Dolen will continue to threaten, libel and slander Ryals and her staff and customers and disclose their confidential information on public forums, to the detriment of Ryals. Therefore, Dolen and anybody working in concert or privity with her, including any employees that she alleges she may have, should be enjoined from any further contact with Ryals, her staff and/or her customers except to the extent that it may be necessary in pursuing the other defendants, if any, herein, ordered to make any such contact through Ryals' counsel of record, and be ordered not to disclose, comment on or otherwise identify Ryals in any forum outside of this suit, including in particular on any Topix or other chat room board, regardless of what alias Plaintiff might use.

Copyright Related Relief

107. To the extent that paragraph 32 of the Amended Complaint, which was deleted from the Second Amended Complaint, asserted that Ryals infringes upon a copyright owned by Dolen, Dolen has not sought or obtained a copyright registration as a condition precedent to claiming copyright infringement.

108. As a result of the lack of any registration, Ryals is entitled, pursuant to 17 USC § 411, to a finding Dolan had no standing to seek redress under the copyright statutes.

109. In addition, Dolen has apparently abandoned her copyright infringement claim in the Second Amended Complaint, as shown by her deletion of those allegations in the Second Amended Complaint.

110. As the prevailing party to a copyright claim, Ryals is entitled to recover her full costs, including a reasonable attorney's fee, pursuant to 17 USC § 505.

Cybersquatting

111. Dolen, immediately prior to filing this suit, registered the domain name www.JulieRyals.com. Since that time and after filing for bankruptcy, Dolen has threatened to sell it to "child pornographers" and has published malicious material regarding Julie Ryals on that site.

112. Moreover, Dolen has threatened to turn www.JulieRyals.com into a child porn site knowing that Ryals, a mother of several small children, would find that highly offensive.

113. Dolen additionally published a self-created "Amnesty Press" newspaper article using a photo of Ryals that Dolen copied from mompack.com without permission for the sole purpose of harassing and slandering Ryals.

114. Dolen later removed that Dolen-created "article" and published self-created, unsigned and documents which she represented were court documents entered by the Court and

urged people to click on the phrase, "Ryals fails to respond and is defaulted", knowing that was false.

115. Dolen has no reasonable business use or need for the website www.JulieRyals.com and is clearly using it to harass and embarrass Julie Ryals, and not for any legitimate purpose.

116. Dolen registered the domain name www.JulieRyals.com in bad faith as that term is defined in 15 USC § 1125.

117. Moreover, after Ryals initially lodged her Cybersquatting counterclaim (and after Dolen filed for bankruptcy), Dolen had the registrant name changed to that of the host that she chose to host that website, for the sole purpose of allowing her to claim that she no longer owns the website.

118. Regardless of the registrant name which Dolen has caused to be listed in the official records, Dolen clearly still has control over the website and its content and is paying the fees required to maintain the registration.

119. Ryals is entitled to the transfer of the domain name www.JulieRyals.com from Dolen to Ryals pursuant to USC § 1125 (c)(1)(C).

PRAYER FOR RELIEF

WHEREFORE, Julie Ryals requests the following relief:

- a. the entry of a take nothing judgment against Ryals on all counts;
- b. a protective order directing Deborah Dolen and anybody acting in concert of privity with her to cease, desist and avoid:
 - i. any further contact with Ryals and/or any of Ryals staff or customers except to the extent that it may be necessary in pursuing the other defendants, if any, herein, except that any such contact necessary to pursue

- any other claims she may have may be made through Ryals' counsel of record;
- ii. any further disclosure, comment on or otherwise identifying Ryals, her family members or her staff in any forum outside of this suit, including in particular on any Topix or other chat room board, regardless of what alias Plaintiff might use;
 - c. ordering plaintiff to take any and all necessary steps to remove Ryals personal identifying information from any and all websites where she has posted such information, including without limitation on www.RipOffReport.com.
 - d. an award to Ryals of costs, including attorney's fees pursuant to 17 USC § 505;
 - e. an award to Ryals of costs and attorney's fees to the extent they are not awarded pursuant to 17 USC § 505;
 - f. an order transferring the domain name www.JulieRyals.com from Deborah Dolen to Julie Ryals;
 - g. an award of pre- and post-judgment interest; and
 - h. such other and further relief as the Court may deem just and appropriate.

Dated: August 6, 2010

Respectfully submitted,

/s/ Kent A. Rowald /s/_____.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **DEFENDANT JULIE RYALS' ANSWER TO SECOND AMENDED COMPLAINT AND COUNTERCLAIMS** has been served on Plaintiff, Deborah Dolen via first class mail (return receipt requested), and/or via email, both with and without electronic receipt requested, on August 6, 2010.

_____/s/ Kent A. Rowald /s/_____
Kent A. Rowald