

**UNITED STATES DISTRICT COURT OF TEXAS  
SOUTHERN DISTRICT HOUSTON**

**Deborah R. Dolen, AKA Author**  
"Mabel White"  
Plaintiff

**Civil Action No.: 4:08-cv-03708**

vs

**Julie Ryals, AKA The Design Shoppe,  
& Jane Doe Libel Cyberstalker,**  
Defendant(s.)

**JUDGE NANCY ATLAS**

United States Courts  
Southern District of Texas  
FILED

FEB 27 2009

**Michael N. Milby, Clerk**

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*Emergency Motion for Injunction*

**Declaration of Plaintiff Regarding Defendants Extortion to Support Temp Injunction**

Although negotiations are generally protected, Defendants counsel was not retained when the following offer by him was made, and the offer is tantamount to extortion. I, the Plaintiff Deborah R. Dolen do swear under the penalty of perjury:

1. The Defendants, by and through their Kent Rowald, when un-retained and later when retained, made the same offers to take the "hate" material down, all the offending content on [www.bustedscammers.com](http://www.bustedscammers.com) if I agree to drop this lawsuit.
2. This is tantamount to extortion because the content humiliates the Plaintiff on a daily basis, in extreme measures where even neighbors read that content and do not want their kids to play with me and that is horrific.
3. There was never a legitimate purpose for any content to be on their sites and using my highly reputable craft book author name also to attract visitors to their site.
4. Continuing to "update" my profile on their site and stalking of their members e-mailing is not legal-and I cannot agree to give up my rights to sue in exchange for them dropping all content about me off that site.
5. Additionally, it admits they DO have control over the site by virtue of such an offer.
6. I will not agree because it is extortion. This harm is on going and not an issue that happened, but is over as to the harm. Such as a car accident.
7. They all submitted themselves to this court and this court now has Jurisdiction to grant a temp injunction of all content until this case is resolved in a legal manner.

DATED: Friday, February 27, 2009

Respectfully submitted,

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Deborah R. Dolen  
3114 Chappelwood Drive  
Pearland, TX 77584  
281-489-6068

I Deborah Dolen \_\_\_\_\_ do hereby certify and affirm a copy of this Motion/Notice has been sent to all parties in this action on this 27<sup>th</sup> day of February 2009 via USPS regular mail.

CC:

Deborah Dolen 3114 Chappelwood Drive, Pearland, TX 77584

Julie Ryals 10601 Brian Lane, New Port Richey, FL

Mary Harvey 1849 Cornell Drive, Jacksonville, FL 32207

Mary Joanne Kidd Cornell Drive, Jacksonville, FL 32207

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