

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

GLOBAL DIRECT SALES, LLC, PENOBSCOT )  
INDIAN NATION, CHRISTOPHER RUSSELL, )  
and RYAN HILL, )

Case No.: 8:08-cv-02468

Plaintiffs, )

-v- )

AARON KROWNE, individually, and d/b/a THE )  
MORTGAGE LENDER IMplode-O-METER )  
and ML-IMplode.COM, KROWNE )  
CONCEPTS, INC., IMplode-EXPLODE )  
HEAVY INDUSTRIES, INC., JUSTIN )  
OWINGS, KRISTA RAILEY, STREAMLINE )  
MARKETING, INC. and LORENA LEGGETT, )

Assigned:

Hon. Deborah K. Chasanow

Defendants. )

**DEFENDANTS' NOTICE OF SPECIAL MOTION AND  
SPECIAL MOTION TO DISMISS PURSUANT TO  
MARYLAND COURTS AND JUDICIAL PROCEEDINGS § 5-807**

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*Attorneys for Defendants Implode-Explode  
Heavy Industries, Inc. and Krowne  
Concepts, Inc.*

PLEASE TAKE NOTICE, that defendants Krowne Concepts, Inc. and Implode-Explode Heavy Industries, Inc., by and through their attorneys, hereby specially move this Honorable Court to dismiss the Complaint as a strategic lawsuit against public participation (“SLAPP Suit”), pursuant to Maryland Code of Courts and Judicial Proceedings section 5-807. This motion will be made on the grounds that this action arises from Defendants’ exercise, without constitutional malice, of rights granted under the First Amendment of the United States Constitution and the Maryland Declaration of Rights.

This motion to dismiss will be based on this notice of motion, the supporting memorandum of points and authorities, the declarations of Julie Turner, Aaron Krowne and Robin Medecke, the exhibits attached thereto, all other materials on file herein; and on such other matters this Court may consider.

Dated: November 10, 2009

Respectfully submitted,

*/s/ Julie S. Turner /s/*

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*Attorney for Defendants*