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File Number
 INK06-702

FAX TRANSMITTAL SHEET

To: Carl H. Starrett II	From: Nicholas D. Myers
Fax: 619.448.3036	Pages: 6 (incl. cover)
Phone: 619.448.2129	Date: June 8, 2009
Re: Parsa Law v. Bad Biz Finder	CC:

Urgent **For Review** **Please Comment** **Please Reply**

• **Comments:**

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FILE NUMBER
INK06-702

Via Certified Mail and Fax

June 8, 2009

Carl H. Starrett II
Law Offices of Carl H. Starrett II
1941-C Friendship Drive
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P: 619.448.2129
F: 619.448.3036

RE: Parsa Law Group, APC vs. Bad Biz Finder, et al.: Injunctive Relief
Superior Court of the State of California, for the County of Orange
Case No. 30-2009-00117752

Dear Mr. Starrett:

As you may be aware, this firm represents Parsa Law Group, APC ("Parsa Law Group") in the above-referenced matter. We write to you with regard to content currently being hosted on one or multiple websites owned by your company or otherwise within its custody or control. Specifically, we refer to content originating from Erin K. Baldwin and/or an entity referring to itself as "Bad Biz Finder."

Ms. Baldwin and Bad Biz Finder, via blogs and other internet postings, have engaged in a tortious and defamatory attack on our client Parsa Law Group, its officers, directors, members, shareholders, agents, representatives, employees and/or affiliates. The conduct resulted in the above-referenced litigation which has now concluded. Pursuant to the attached Default Judgment by Court, Ms. Baldwin and Bad Biz Finder are henceforth permanently enjoined and restrained from publishing, transmitting, distributing or otherwise publicly displaying defamatory and/or tortious statements about or concerning Parsa Law Group, its officers, directors, members, shareholders, agents, representatives, employees and/or affiliates.

In making its ruling, the Court noted that there was irrefutable evidence that Ms. Baldwin and Bad Biz Finder were engaging in defamatory activity and that such defamation was made with malicious intent in an effort to injure the reputation and livelihood of our client, its employees and representatives.

Parsa Law Group, APC: Request for Removal of Content

June 8, 2009

Page 2 of 2

As noted above, it has come to our attention that some of the tortious and defamatory statements have been posted, reposted, or are otherwise available for viewing by the public on one or multiple websites owned by your company or otherwise within its custody or control. Specifically, with reservation of rights to supplement this list, we are aware of statements viewable at the following URL's:

<http://www.chs-law.com/2009/01/bankruptcy-and-loan-modifications-hype.html>

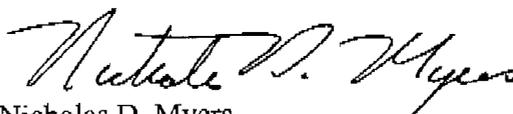
Let this correspondence serve as notice that your company is hosting tortious and defamatory statements, statements which Ms. Baldwin and Bad Biz Finder are now ordered by the Court to remove. We seek your assistance in the removal of the content and appreciate all cooperation in that regard. Specifically, we ask that you immediately remove the above-referenced content from your website(s). It goes without saying that the hosting of tortious and defamatory statements serves no interest of your company.

While we are only requesting your assistance with this matter at this time, please be advised that our client is suffering severe and ongoing harm both financially and in the way of tarnishing of its goodwill and reputation. Thus, this correspondence also serves to place you on notice that your company is hosting these tortious and defamatory statements and, while it is not our preference to do so, should you not comply with the foregoing request, our client has authorized us to take all available legal action to protect its rights, including initiation of a civil action if necessary.

It is our hope that the process of removing these statements can be an amicable one as between our office and your company. Thus, we invite you to contact us with any questions or concerns or simply to discuss the matter further.

We thank you in advance for your courtesy and cooperation in this matter.

Most sincerely,
BURKHALTER KESSLER
GOODMAN & GEORGE LLP



Nicholas D. Myers
Attorney

Enclosure(s) as stated herein.

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
JUN 02 2009
ALAN CARLSON, Clerk of the Court
Turner
BY S TURNER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

PARSA LAW GROUP, APC, a California
Professional Law Corporation,

Plaintiff,

v.

BAD BIZ FINDER, an unknown business
entity; ERIN K. BALDWIN, an individual;
AKO BEVERLY SULLIVAN

Defendants.

Case No. 30-2009-00117752

Assigned for all purposes to the:
Honorable Judge Franz E. Miller
Department C14

Jim
~~PROPOSED~~ DEFAULT JUDGMENT
BY COURT WITH PERMANENT
INJUNCTION

The Court having reviewed all papers submitted by Plaintiff Parsa Law Group, APC, in support of its Request for Default Judgment by Court against Defendants Bad Biz Finder, an unknown business entity, and Erin K. Baldwin, an individual and doing business as Bad Biz Finder, and having heard sworn testimony by James M. Parsa, Esquire, principal for Parsa Law Group, APC, the Court rules as follows:

It appearing that Defendants Bad Biz Finder and Erin K. Baldwin, having been regularly served with process, having failed to appear and answer Plaintiff's Second Amended Complaint filed herein, and the Default of these Defendants having been duly entered; upon application of

1 Plaintiff to the Court, and Declarations and evidence, including Declarations and papers, under
2 California Code of Civil Procedure section 585(d), and sworn testimony, having been
3 considered,

4 **IT IS SO ORDERED** that Plaintiff have and recover Judgment from Defendants Bad
5 Biz Finder, an unknown business entity, and Erin K. Baldwin, an individual and doing business
6 as Bad Biz Finder, jointly and severally:

7 1. In the principal sum of \$604,515⁶⁶ plus interest thereon at the rate of ten
8 (10%) percent per annum from JUNE 2, 2009; and

9 2. Costs pursuant to CCP §1033.5 in the amount of 976⁷⁶.

10
11 **IT IS FURTHER ORDERED** that Defendants BAD BIZ FINDER and ERIN K.
12 BALDWIN, and all those in active concert or participation with them, are from this day forward
13 enjoined and restrained from:

14 1. Publishing, transmitting, distributing or otherwise publicly displaying all
15 previously-publicized or publicly available defamatory, ~~disparaging~~ and/or
16 tortious statements about PARSA LAW GROUP, APC, PARSA LAW GROUP,
17 APC's services, and/or PARSA LAW GROUP, APC's officers, directors,
18 members, shareholders, agents, representatives, employees and/or affiliates,
19 namely those blog entries/articles previously and/or currently available at the
20 websites *www.badbizfinder.wordpress.com*, *www.badbizfinder.blogspot.com* and
21 *www.thereallybadbizfinder.wordpress.com* and reproductions and variations
22 thereof previously and/or currently available elsewhere, including, but not limited
23 to: *www.ripoffreport.com*, *www.pubcit.typepad.com* (CL& P Blog),
24 *www.ocmetrobusiness.com* and *www.digg.com*;

25 2. Publishing, transmitting, distributing or otherwise publicly displaying
26 ~~disparaging~~ and/or tortious statements which state or imply illegal conduct by
27 PARSA LAW GROUP, APC, and/or PARSA LAW GROUP, APC's officers,
28

1 directors, members, shareholders, agents, representatives, employees and/or
2 affiliates, absent adjudication of illegality;

3 3. Publishing, transmitting, distributing or otherwise publicly displaying all
4 previously-publicized or publicly available defamatory, ~~disparaging~~ and/or
5 tortious statements about PARSA LAW GROUP, APC, PARSA LAW GROUP,
6 APC's services, and/or PARSA LAW GROUP, APC's officers, directors,
7 members, shareholders, agents, representatives, employees and/or affiliates in
8 including those found in Exhibit "B" to Plaintiff's Request for a Temporary
9 Restraining Order;

10 4. Publishing, transmitting, distributing or otherwise publicly displaying
11 defamatory, ~~disparaging~~ and/or tortious statements about PARSA LAW GROUP,
12 APC, PARSA LAW GROUP, APC's services, and/or PARSA LAW GROUP,
13 APC's officers, directors, members, shareholders, agents, representatives,
14 employees and/or affiliates; and

15 5. Contacting PARSA LAW GROUP, APC's officers, directors, members,
16 shareholders, agents, representatives, employees and/or affiliates, either directly or
17 indirectly.

18 The above injunction relief is effective immediately and shall remain in place in
19 perpetuity.

20 **IT IS SO ORDERED.**

21
22 Dated: June 2, 2009

23 
24 Honorable Franz E. Miller
25 Judge, Superior Court of California
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