

**Defendant Pro Se's Response to Case Docket Documents 127, 128 and 131**  
**Case 8:15-cv-00011-EAK-TBM**

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

**Case number: 8:15-cv-00011-EAK-TBM**

OXEBRIDGE QUALITY RESOURCES  
INTERNATIONAL, LLC, and  
CHRISTOPHER PARIS, individually.

Plaintiffs,

Vs.

MARC TIMOTHY SMITH, individually,  
and d/b/a/ CAYMAN BUSINESS SYSTEMS

Defendant.

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Presiding Judge: Elizabeth A. Kovachevich

Referring Judge: Thomas B. McCoun III

Court: Florida Middle District Court

Office: Tampa Office

County: Hillsborough

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FILED  
2017 SEP 22 AM 11:20  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

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**RESPONSE TO CASE DOCKET DOCUMENTS 127, 128 and 131**

Comes now the Defendant, MARC SMITH, filing Pro Se, to respond to Case Docket Documents 127, 128 and 131.

**Case Docket Document 127**

Despite PARIS' public claims to the contrary, the case/lawsuit was closed by the Mediation Settlement Agreement of 5 June 2015. The only "follow-up" was a "Second Notice of Breach of the Stipulation on Injunction" claim by Mr. Wohlsifer. The Judgment of January 18, 2017 had only to do with the claimed "Violation of the Stipulation on Injunction". This had nothing to do with who "won" or "lost" the lawsuit. The lawsuit was for all intents and purposes dismissed by the Mediation Settlement Agreement of 5 June 2015. Contrary to Mr. Lorenzo's assertions, the 18 January 2017 judgment was only with respect to the supposed Violation of the stipulation on injunction in favor of the Plaintiff. Contrary to Mr. Lorenzo's claim that "...a series of orders in favor of the Plaintiff were made...", the reality is an (one) order was entered and it addressed the supposed Violation of the Stipulation on Injunction. Nothing more and nothing less. Mr. Lorenzo is seriously stretching the truth, to say the least, or has not read the docket documents. Mr. Lorenzo's claim that "... Unfortunately, the Defendant has chosen not to abide by the court's order[s]..." is unfounded, an *accusation* without evidence.

**Case Docket Document 131**

1. Mr. Lorenzo did not mail SMITH a copy of his notice of appearance until approximately one month *AFTER* filing docket document 124 (filed on 7/7/2017) with the Court. In short form - *Mr. Lorenzo did not notify SMITH for over a month and his actions/response make clear he felt no requirement or*

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*need to.* Of note is that the court, in court docket document 126 note 1 says: *"...In addition, his entry did not include a certificate of service and it does not appear that Mr. Smith was mailed a copy of counsel's appearance..."* Assuming this is a requirement, why did the Court allow Mr. Wohlsifer to withdraw, and allow Mr. Lorenzo to take over with no notification to SMITH? Does the law allow this? If NOT, why the "note"?

SMITH is filing Pro Se and as such has to be realistically understood (remembering this is a **civil** case), there can be no realistic expectation that SMITH, a novice, can, or will (short of actually going through law school and passing the Florida bar exam {and this not to mention being licensed to practice in Federal Court} ) can/will fully be aware of all the millions of laws, especially Florida's "Local Rules".

2. Mr. Wohlsifer lied to the Court in court docket document 125 in his Certificate of Service statement. No such document was received at 8466 Lesourdsville West Chester Road, West Chester, Ohio 45069. This has happened numerous times before so it is not surprising. E.g. Court docket documents 80 and 82 which were never mailed to SMITH. In fact, in the 12 January 2016 telephone hearing the Court required SMITH and PARIS to exchange evidence to be presented at least 5 days prior to the 16 March 2016 10:30AM hearing. SMITH had no evidence to present, but PARIS disobeyed the Court's requirement as SMITH did not get any notice of evidence to be presented by PARIS's attorney. In fact, court docket document 80 has written in the hearing date in both the Date Identified and Date Admitted columns which was the first time SMITH was made aware of, and given a copy of the evidence to be presented. That was *NOT* 5 days advance notice as the Court stated it required in the 12 January 2016 telephone hearing (yes, I do have a transcript of the telephone hearing). Do Judges orders matter? Does it matter

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when an attorney obviously lies to the Court? Lawyer blindsides opponent –  
Not new, but Judge doesn't care...

3. SMITH did not have a chance to object to Mr. Wohlsifer's withdrawal since he was not notified of it by Mr. Wohlsifer (see 2 above). SMITH learned of it in docket document 126 filed by the Court on 8/1/2017 which the Court mailed to 8466 Lesourdsville West Chester Road, West Chester, Ohio 45069 via USPS and which was received approximately one week later and was sent via internet to SMITH within 12 hours by SMITH's West Chester, OH Property Manager.
4. Docket document 131-1 (the postal receipt) shows that the letter was mailed via certified mail and, as is visible on the actual credit card receipt, was sent requiring a Return Receipt. Mail to SMITH at that address, including certified mail, will be delivered, however *if a Signature Return Receipt is required* the letter will be returned to the sender as SMITH does not reside there to sign for receipt. Had Mr. Lorenzo read all of the court documents, the reason *why* would have been understood.

SMITH's address of record: 8466 Lesourdsville West Chester Road, Old West Chester, Ohio 45069 is no more than SMITH's address for US federal tax purposes. SMITH rarely "resides/lives" there. Had Mr. Lorenzo actually entirely reviewed the case he would know why. PARIS' attacks are so unhinged it is difficult for SMITH to know if PARIS is dangerous. See the following "unhinged rant": <https://www.linkedin.com/pulse/cant-access-oxebridges-free-iso-template-kits-blame-elsmar-paris/> (Exhibits "B" and "D" attached)

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**Responses to Docket Documents 126 and 128**

**Failure to Respond to the Judges Order in Court Docket Document 126**

5. Mr. Lorenzo ignored the Court and has **still** not responded to court docket documents 122 and 123 which specifically address PARIS's continuing Breach of the Stipulation on Injunction as requested by the Court in court docket document 126, which clearly states: *"Additionally, Mr. Lorenzo is directed to respond to Defendant's Motion to Compel Compliance with Stipulation on Injunction (Doc. 122) within ten days of the date of this Order."* **Mr. Lorenzo openly defied the Court and did not, and has not, done so.**

Mr. Lorenzo responded with a litany of **assertions** in court docket document 128 in an attempt to "re-litigate" the 16 March 2016 hearing without so much as reviewing the evidence of compliance as far is possible on the internet which SMITH submitted to the court. No evidence - Only **assertions** (throwing mud). SMITH has responded to court docket document 128 at length in court docket documents 129 and 130, but obviously needs to add to those documents herein. Additional comments are herein below.

No proof of any kind was presented by Mr. Lorenzo to back up Mr. Lorenzo's **assertions** - This was flinging mud against the wall, pure and simple. Many links are to posts/articles authored by one Daryl Guberman (e.g.: <http://vob9009.com/chris-paris-of-oxebridge-attacks-veteran-%20supporter-daryl-guberman-and-vob-9009/> ) which have absolutely nothing to do with SMITH, much less the Stipulation on Injunction. SMITH is well aware of PARIS' internet battle with GUBERMAN (e.g.: See Exhibits C and C-1 which have been leaked onto the internet), but why is their fight being brought into Mr. Lorenzo's response to court docket documents 122

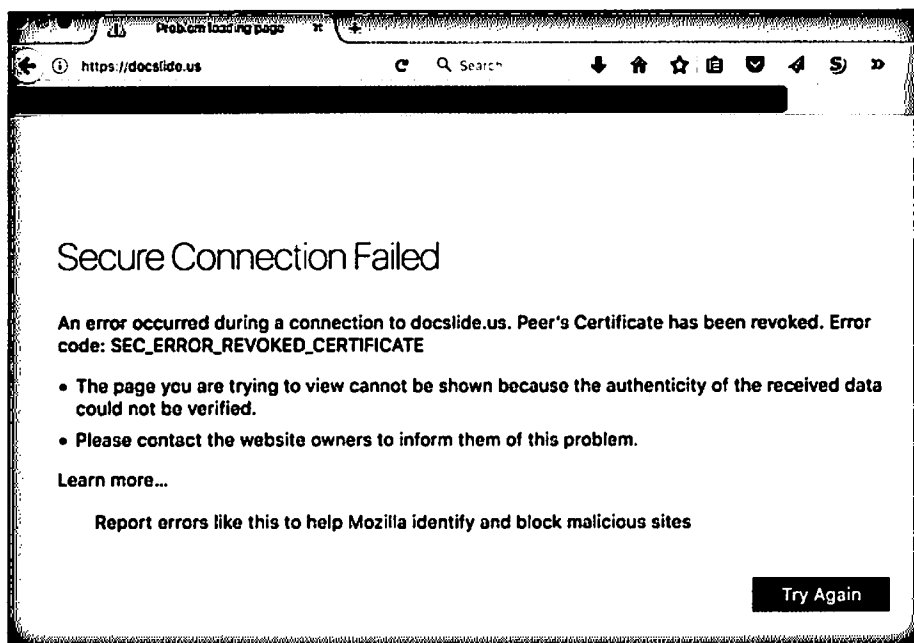
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and 123? Mr. Lorenzo included 2 ½ pages (PLUS) of totally irrelevant links (mud) within his response (court docket document 128), as well as many "dead" links with no content.

And PARIS? PARIS states *"...The only problem, of course, is that Peachfarm doesn't really exist, nor does his company. We know this for a variety of reasons, not the least of which is that Swiss companies don't form "LLCs" but instead "GmbH" companies because the Swiss actually speak German, not English, so "limited liability corporation" doesn't mean anything in Switzerland."* While it doesn't have anything to do with the current document, well, no it doesn't but many US states allow foreigners to own LLCs and other corporate entities. Check Delaware, Nevada, Wyoming, Arizona and many more states. Mr. PARIS, like Mr. Lorenzo, has obviously not been doing his homework. More assertions and "mud". Mr. PARIS is proving he is a libelous fake "news" and troll king! Or, Mr. PARIS is simply stupid and/or ignorant.

6. Many, many links are cited by Mr. Lorenzo simply not even valid, such as links to "docslide.us":

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SMITH has no idea what “docslide.us” is about, and had never heard of “docslide.us” until reading court docket document 128. Mr. Lorenzo cites numerous links to a website with can not be reached, and “docslide.us” is not the only “dead” links... No evidence – Mr. Lorenzo submits unfounded *assertions and totally bogus internet “links” to the Court.*

**Court Docket Document 128, Line Items 11 through 19**

7. Line item 11: In court docket documents 122 and 123 SMITH did no more than give **notice** to the Court, to PARIS’ attorney of record, and to PARIS himself, that PARIS had been, since the date of the Stipulation on Injunction to the date of court docket documents 122 and 123, and has *continuously* been violating the Stipulation on injunction (approximately 2 ½ years). Court docket documents 122 and 123 are clearly labeled:

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Case 8:15-cv-00011-EAK-TBM Document 122 Filed 06/19/17 Page 1 of 9 PageID 1308  
 Defendant Pro Se's **Notice** of Violation of Stipulation on Injunction by Christopher Paris (Oxebridge)  
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IN THE UNITED STATES DISTRICT COURT  
 MIDDLE DISTRICT OF FLORIDA  
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 INTERNATIONAL, L.I.C. and  
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Defendant.

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 MIDDLE DISTRICT OF FLORIDA  
 TAMPA, FLORIDA

Case 8:15-cv-00011-EAK-TBM Document 122 Filed 06/19/17 Page 2 of 9 PageID 1309  
 Defendant Pro Se's **Notice** of Violation of Stipulation on Injunction by Christopher Paris (Oxebridge)  
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**DEFENDANT'S **NOTICE** TO PLAINTIFF OF PLAINTIFF'S VIOLATION OF THE  
 STIPULATION ON INJUNCTION AND MOTION TO COMPEL COMPLIANCE**

Nor did SMITH make a "Motion" per se. SMITH simply requested:

**WHEREFORE, defendant, SMITH, requests that if PARIS does not remove all of his posts from all Internet venues on which he has posted them, and those on his Oxebridge website, in which SMITH and/or Elsmar are mentioned within 10 business days of receipt of this Notice of Breach/Violation of the Stipulation on Injunction, that this Honorable Court compel CHRISTOPHER PARIS to do so by issuing a Court Order to force CHRISTOPHER PARIS' compliance with the Stipulation on Injunction/Court Order of 23 March 2015.**

PARIS has had plenty of time to comply, or deny, and as of this date is still



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thumbing his nose at the Court. PARIS obviously has absolutely no respect for the law or the Court. Is this not outright Contempt of Court with regard to the Stipulation on Injunction?

Nor has SMITH posted *anything* about PARIS *anywhere* on the internet since July 2015, despite PAIS' claims to the contrary, which were all **indirect** references (see court docket documents 122 and 123). The Court *gave* ("awarded"???) PARIS US\$1000.00 plus nearly US\$5,000.00 in attorney fees for *indirectly* referring to PARIS about 3 times which is discussed in court docket documents 122 and 123, while the entire time PARIS was openly publically defying the court order. This is "justice"? SMITH was penalized while PARIS is, and as of this date, 18 September 2017, still is, continuing to defy the Court and violate the Stipulation on Injunction.

Mr. Lorenzo's statement: "...*especially noting the voluminous instances of the Defendant's malicious defamatory activity against and regarding the Plaintiff since the closure of the case and judgment.*" is totally unfounded and Mr. Lorenzo has provided no evidence to substantiate his *allegations*. More mud against the wall. Canned "lawyer" speak and "fake news", submitted to the Court.

Post-settlement it was PARIS/Mr. Wohlsifer who filed a Second Notice Of Breach of the Stipulation of Injunction, almost all of which was already settled in the Mediation Settlement Agreement. Let us speak of "spiteful retribution."

8. Line item12: Mr. Lorenzo states: "...misstatements throughout Defendant's filed notice, along with its mischaracterizations of court information and decisions..." yet Mr. Lorenzo provides *not one example*. More "canned" "mud" lawyer response. *Allegations*.

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9. Line item 13: "...the Plaintiff seeks the Court to quash and or to strike the Defendant's filing for additionally failing to file in good faith and violation of the Local Rules." SMITH followed the Judge's advice in the telephone hearing on the Stipulation back in March of 2015 (3/3/2015 at 3:00PM) and rather than a hearing agreed to "...work it out with Mr. Wohlsifer by telephone and email..." which ended up with both a DRAFT copy of the Stipulation being submitted to the Court, as well as a Case Management Report which there were disagreements on. Mr. Wohlsifer hornswoiggled SMITH by use of a graphic of SMITH's signature which he placed on documents which he then submitted to the Court. SMITH provided a NOTICE of Violation of the Stipulation of Injunction (court docket documents 122 and 123) to PARIS directly, PARIS' lawyer of record at the time, and to the Court to ensure the Court was aware that SMITH had communicated with PARIS and his attorney. PARIS' attorney effectively "jumped ship" and PARIS did not respond.
10. Line item 14: "...*By information and belief*, the Defendant is in breach of the parties' Joint Stipulation and doing so as "spiteful retribution." – First of all, as mentioned above herein, this is about the fact that PARIS is, and has been *continuously* violating the Stipulation on injunction since it was agreed to over 2 ½ years ago. Mr. Lorenzo is attempting to shift the subject and to re-litigate the 16 March hearing (much as Mr. Wohlsifer did in his "Second Notification of Breach in 2015) without responding one bit to PARIS' continuing, 2 ¾ year long continuous breach. Of note is the statement: "...*By information and belief*" – No "information" (much less evidence) is provided, and belief is totally open to , especially in Exhibit "D", a totally unhinged rant, interpretation. SMITH seriously *believes* PARIS is plotting to murder SMITH "...*By information and belief*".

Spiteful retribution? One has only to review the evidence presented in/within court docket documents 122 and 123 to see "spiteful" on the part of PARIS.

"Spiteful? One only has to read Exhibit "D" to see PARIS is not only "spiteful",

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but, as some have opined, "unhinged". SMITH believes PARIS is seriously dangerous. Does Mr. Lorenzo propose that PARIS be granted privilege of some sort to be "spiteful" to SMITH and expect SMITH to stay silent? This whole lawsuit is predicated on PARIS' "spite" for SMITH not selling Elsmar to PARIS at a price PARIS didn't like:

TWEETS	FOLLOWING	FOLLOWERS
254	7	40

The Oxebriidge Report - eepurl.com/7GTNj

**Oxebriidge** @Oxebriidge · Nov 5 2014  
Seriously, @LinkedInHelp, you are shutting down the site for FIVE WHOLE HOURS?

**Oxebriidge** @Oxebriidge · Oct 29  
Implementing #CMMI-SVC, #ISO9001 and #ISO20000-1 simultaneously... quite an intellectual workout.

**Oxebriidge** @Oxebriidge · Oct 23  
Marc Smith at @ElsmarCove has increased the amount he wants to delete negative posts about Oxebriidge to \$2.5 Million. Can't make this up.

**Oxebriidge** @Oxebriidge · Oct 23  
@ElsmarCove just raised the amount to delete negative posts about Oxebriidge to \$2.5 million. Get your popcorn out.

**Oxebriidge** @Oxebriidge · Oct 21  
@ElsmarCove accidentally outs his pal Wes Bucey as a former convicted drug trafficker and money launderer. articles.chicagotribune.com/1988-04-30/new...

**Oxebriidge** @Oxebriidge · Oct 20  
@ElsmarCove just upped the amount to extort Oxebriidge to \$2 Million. law enforcement now engaged.

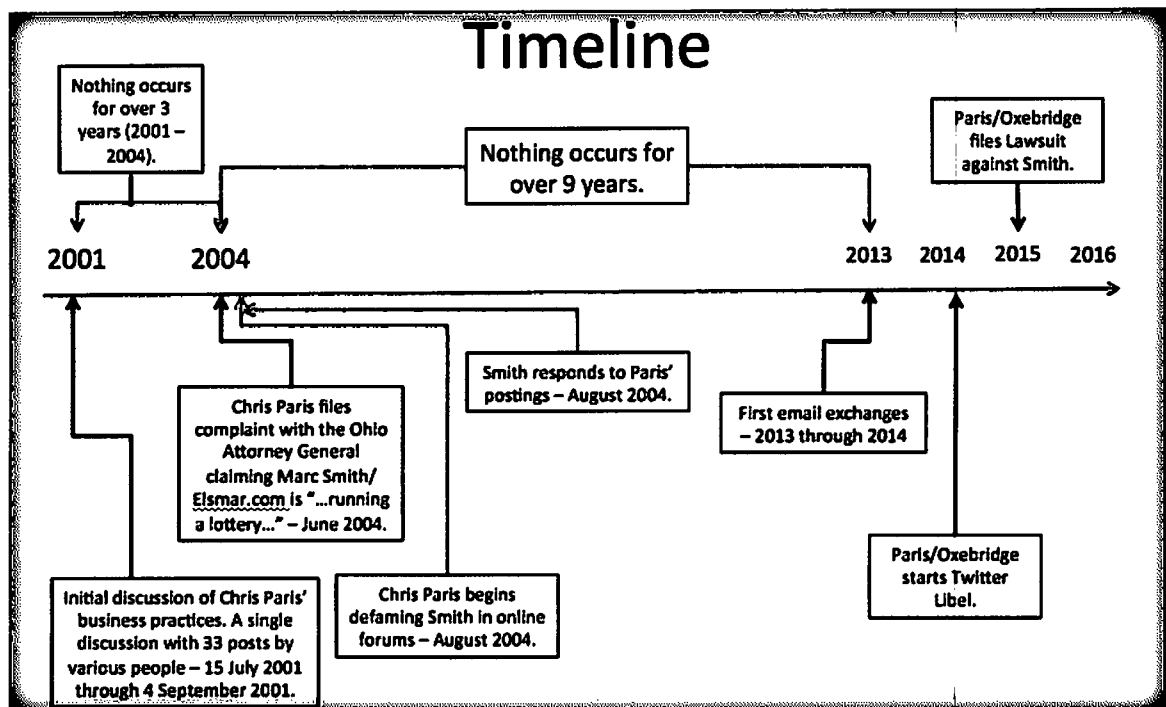
**Oxebriidge** @Oxebriidge · Jul 24  
The Oxebriidge Report - eepurl.com/ZldaX

This is how PARIS operates. Bear in mind this was in 2014 prior to the lawsuit.

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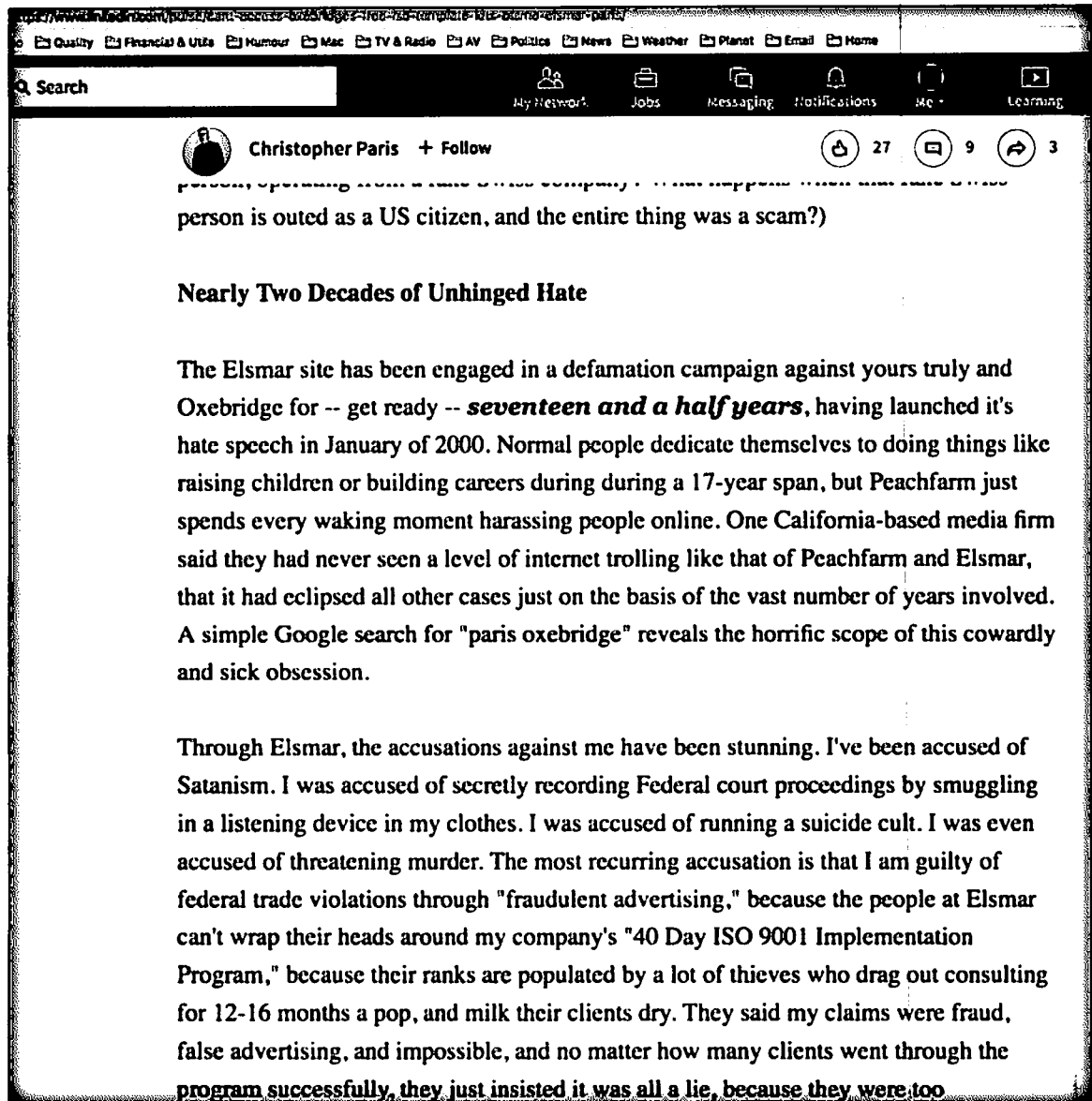
PARIS was "baiting"/"trolling" SMITH, pure and simple. PARIS is an internet "Troll". "Extortion"? "Law enforcement now engaged"? Really? And what happened to that... SMITH thinks these days it is called "fake news". PARIS smeared and libeled SMITH in 2014 not only on "Twitter", but on other public internet venues in attempts to smear and libel SMITH, and this was well *before* PARIS filed this totally frivolous civil lawsuit approximately 3 months later, under, of all things, 450 "Commerce", and detailed as court docket document 1-1 filed on 5 January 2015. This entire lawsuit has been a waste of the court's time, and, as Mr. Lorenzo states, "assertions". Reality of the "conflict":



Yet, PARIS publishes fake, defamatory information such as this which he posted on LinkedIn (see court docket document 122 Exhibit "D", and which is still posted on LinkedIn as of 17 September 2017) – Libel such as:

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Seventeen and ½ years? Satanism? Harassing people online? Who else is he referring to? And what is this California based media firm? Someone accused PARIS of running a "suicide cult"? Who? Where? Talk about pulling BS out of one's rear end and publishing it.

And really – *"Normal people dedicate themselves to raising children or building careers during a 17 year span"*? Is PARIS from outer space? SMITH is almost 70 years old, retired with a very successful career, and his only child, a daughter,

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has her masters and has been continuously employed since her high school days. SMITH is very proud of his daughter. Her name is Ashley Wagner-Smith (Go ahead Chris – Try to DOXX her...). It appears that PARIS is the person who should be *dedicating himself to raising his children (or child) or (and?) building career.*

PARIS' current "career" – Pleading for his "Legal Defense Fund":

Oxebridge Quality Resources | ISO 9001, AS9100 implementation, ... <https://www.oxebridge.com/emmi/>

*and your information is never used for any other purpose.* Email Address


**Sign Me Up!**

**Defend Your Rights**

Since 1999, Oxebridge has worked to improve both the content of ISO and AS standards, as well as the certification schemes surrounding them. Because we are asking the incumbent authorities to abide by international rules and law, this has put us in the crosshairs of their legal attacks. Oxebridge has successfully defended against attacks by ISO, certification bodies, quality industry publishers, sellers of counterfeit ISO certificates and more.

*Doing this is not cheap. Oxebridge is forced to invest heavily in legal counsel to prosecute lawsuits against the bad actors and to defend itself from frivolous suits. So far our success rate is 100%, but we need your help to keep up the fight.*

Donate to the  
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Let us look at this. One lawsuit against him in 2014 (New York) for libel - Judge dismissed for lack of jurisdiction. A lawsuit against SMITH which was settled out of court (cost to litigate). And a current lawsuit against PARIS by William Levinson for libel which is still in progress. No other lawsuits. Nor has PARIS filed any lawsuit against any party other than SMITH. This is cheap 2AM TV advertising. Success rate is 100%?

In the 16 March 2016 hearing PARIS complained that SMITH had cost PARIS so much money that PARIS might have to move his daughter to a public school.

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SMITH's daughter attended a public school and has done quite well.

11. Line items 15 and 16: Mr. Lorenzo wants some money. Imagine that. That's what this is really all about, in reality. A lawyer getting some money This was/is an obviously frivolous lawsuit filed to "cost the defendant financially" and to affect SMITH's reputation negatively. PARIS has failed miserably. PARIS settled out of court and got a whopping US\$1000 for his complaint of Violation of the Stipulation on Injunction. His lawyer's submitted bills showing PARIS wanted US\$200,000 plus!

As noted in court docket documents 122 and 123, PARIS' attempt to smear and libel SMITH were useless as SMITH effectively retired well over 15 years ago, and SMITH's contacts from the past know PARIS and his "fake news"/troll persona. No company or organization wants anything to do with PARIS – PARIS is pure poison.

SMITH has to honestly say this entire "episode" has, and continues to, make PARIS "persona non grata" in many organizations (e.g. the ASQ, IAQG, etc.), not to mention hundreds of companies so SMITH is not particularly aggrieved. SMITH finds it interesting to watch a person such as PARIS self-destruct in real time.

12. Line item 17: As SMITH has shown in various court submissions, SMITH has posted nothing, anywhere, since July 2015, has removed what SMITH had the power and authority to, and Mr. Lorenzo has provided no proof otherwise. Nor has Mr. Lorenzo spent time to ascertain the information PARIS has, obviously, provided him with. Nor has Mr. Lorenzo complied with Local Rule 3.01(g).

Mr. Lorenzo states this as if SMITH is responsible for anything anyone posts about PARIS and/or OXEBRIDGE as if SMITH has the power and the authority

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to remove what anyone, anywhere, posts about PARIS and/or OXEBRIDGE. SMITH proposes that Mr. Lorenzo read the Stipulation on Injunction, and as a professed "internet attorney" specialist Mr. Lorenzo should well know that it is impossible for SMITH to remove what ever anyone, anywhere, posts about PARIS and/or OXEBRIDGE on the internet. The thought is absurd on its face.

Also of note is there is no restriction on SMITH in the Stipulation on Injunction or elsewhere which prohibits SMITH from giving interviews or other wise communicating to journalists, students of law schools, or others interested in writing about the lawsuit, his opinions. Even this document may be shared with news organization, law students and other interested parties. This is NOT a "private" document.

13. Line item 18: Mr. Lorenzo has obviously not reviewed any of the evidence submitted to the Court in court docket document 102 which included a DVD and CD, in addition to Exhibits "A", "B", "C" and "D" providing the Court evidence that SMITH has done everything in his power to comply. SMITH has fully complied with the Court Order approving the Joint Stipulation on Injunction, as far it is in SMITH's power to do so. Mr. Lorenzo has provided no evidence to the contrary. Mr. Lorenzo has submitted to the Court only *allegations* (aka "mud") in violation of Local Rule 3.01(g). SMITH believes Mr. Lorenzo should do his homework rather than sling unsubstantiated mud at SMITH.
14. Line item 19: Mr. Lorenzo wants some money. We know that. Standard "canned" response.
15. Line item "a": Has been addressed herein and in other court documents cited herein.



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16. Line item "b": Already addressed herein.
17. Line item 'c': Mr. Lorenzo wants money. Standard "canned" response. Thing is, Mr. Lorenzo is wanting money to re-litigate the hearing and ignoring the ensuing evidence from SMITH that SMITH did what he could to comply with the Court whist at the same time totally ignoring the aspect of PARIS continuously, for approximately 2<sup>1/2</sup> years, continues to violate the Stipulation on Injunction...

**REQUEST OF THE COURT**

18. REQUEST OF THE COURT - See Summary "C" below. To date, 18 September 2017, PARIS has not complied with the Court's Order approving the Joint Stipulation of 2015.
19. Defendant requests that this Court enter such sanctions as are equable, inclusive of all costs and for SMITH's time for the necessity of having to write these documents, as consequential damages.

**SUMMARY**

- A. *PARIS has been violating the Joint Stipulation on Injunction both directly and indirectly, and is currently doing so openly as of the date of this document, directly and by reference continuously on his Oxebridge website, as well as other internet venues, as noted herein such as on LinkedIn in May 2017, and in his own Oxebridge.com website since the Stipulation on Injunction was approved on 23 March 2015 (1 ½ years). [Docket Document 35] Of note is that PARIS was violating the Stipulation on Injunction during the 16 March 2016 hearing in Tampa, just as he continues to do so on this day of 18<sup>th</sup> day of August 2017 (approximately 1 ½ years).*

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- B. As of this date PARIS is still violating the Joint Stipulation on Injunction as detailed in Docket Documents 122 and 123.
- C. SMITH believes the Court should sanction, as appropriate, Mr. Lorenzo for filing Docket Document 126. It is not appropriate, lacks any evidence of his voluminous accusations, is obviously outright **libelous**, an abuse of process and a waste of the Court's resources and time, especially noting the voluminous instances of unfounded *allegations* and accusations, including obviously stupid expectations that SMITH has any control of, or responsibility for, what GUBERMAN, Levinson and others are doing, and for not "doing his homework" in reviewing the case (so much unsubstantiated "mud slung against the wall") to know what has already been addressed. This is a real, credentialed lawyer filing this garbage?
- D. ***SMITH again wants to stress that SMITH seeks no money for financial damages caused by PARIS' unhinged, libelous "rants" (e.g. Exhibits included in Documents 122 and 123 {aka EVIDENCE}). Although retired and living on Social Security, SMITH's reputation in the business and standards community has only grown thanks to PARIS and his "rants".***

PARIS, through his unhinged rants (e.g: Docket Document 122 Exhibit "D") on venues such as "LinkedIn", is doing an excellent job at making himself *persona non gratia, a pariah*, at so many organizations and companies such as the ASQ, the IAQG and numerous aerospace companies, the International Organization for Standardization, UL, BSI, DNV, NQA, SpaceX, UKAS, ISOQAR, etc. (I could go on... and on...).

- E. *Of note is that PARIS was forced to remove his "client list" from his Oxbridge website around February 2017 due to complaints by clients who wanted to*

Defendant Pro Se: Marc Timothy Smith, 8466 Lesourdsville-West Chester Road

West Chester, Ohio 45069 Tel: 513 341-6272

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*distance themselves from PARIS and PARIS' "poison". PARIS is self-destructing by his own actions. It has been reported by Guberman and Levinson that PARIS had to remove over 100 pages, and "probably" over 200, from his Oxebridge website over which PARIS has complete control, complaints from former customers (such as from SpaceX) and various other complaints, during January and February of 2017. No one want's to touch PARIS. Any connection with PARIS is poison best ignored and avoided.*

- F. SMITH also wants to remind that this entire lawsuit has been a sham. Claims of "Unfair Competition" have been shown to be totally FALSE, with no evidence presented to substantiate the claim. Claims of Extortion have been discredited by evidence provided in SMITH's "answer" to the complaint - There was no "extortion". Law enforcement" was never involved. Claims of libel - again, no proof which requires evidence of SMITH stating a falsehood, anywhere, ever. This entire case has been a disgraceful sham from the beginning as SMITH detailed in Court Docket Document 17.

WHEREFORE, defendant, SMITH, requests that this Honorable Court enter an Order that:

- A. Dismisses PARIS' attorney's submission (Docket Documents 126, 128 and 131) as *libelous*, totally devoid of any **evidence** of his presented "claims" including items such as his claim that "... SMITH apparently provided the blog court documents which were sealed at the time..." which only shows Mr. Lorenzo's total ignorance of the facts in this case much as Ms. Boone was (*why was she even there? SMITH wonders*) during the March 2016 hearing in Tampa.
- B. Finds the Plaintiff, PARIS, in breech of the Joint Stipulation on Injunction;

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- C. Finds the Plaintiff, PARIS, in violation of the Court's Order dated 23 March 2015;
- D. Award the defendant fees for preparing Documents 122, 123 and related costs and fees, and this document in response to Documents 126, 128 and 131 as a consequential damage resulting from having to respond to the continual, ongoing and current breaches of the Stipulation on Injunction, and the failure of Mr. Lorenzo to file a valid brief with **EVIDENCE** (rather than outright "mud slinging") of his accusations, to the Court thus wasting the Courts time.
- E. Sanction Mr. Lorenzo, as appropriate, for filing a *libelous*, unresearched, fact free documents with NO EVIDENCE to back up his *allegations* to this Honorable Court.

**FEES**

Return to SMITH his US\$6K he was penalized for the 13 March 2016 "hearing", and consider compensation for SMITH having to respond to Mr. Lorenzo's totally evidence free filing.

**CERTIFICATE OF SERVICE**

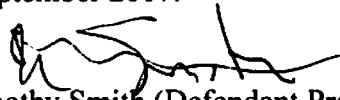
I hereby certify that a true and correct copy of the foregoing has been mailed to the Court via the USPS via USPS Certified Mail.

Defendant Pro Se's Response to Case Docket Documents 127, 128 and 131

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Mr. Lorenzo – The current Attorney of Record (for this case) for Christopher Mark Paris will be notified at/via electronic notification via the Court's CM/ECF portal when the Court clerk enters this document into the court record.

Respectfully submitted to the Court using the US Postal Service Certified Mail mailed on this 18<sup>th</sup> day of September 2017.



Marc Timothy Smith (Defendant Pro Se) By Marc Timothy Smith

Marc Timothy Smith

c/o Property Caretaker

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