

Defendant Pro Se's Response to Case Docket Document 132  
Case 8:15-cv-00011-EAK-TBM

FILED

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

2017 SEP 29 AM 11:21  
CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

**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 (a non-existent business since 2001)

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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**RESPONSE TO CASE DOCKET DOCUMENT 132**

Comes now the Defendant, MARC SMITH, filing Pro Se, to respond to Case Docket Document 132.

**Case Docket Document 132**

1. Judge Kovachevich has “denied” a Notice, not a “motion”, which SMITH served to PARIS and PARIS’ lawyer. Documents 122 and 123 are clearly labeled as a NOTICE. Nothing in Florida or Federal law that SMITH is aware of prohibits a defendant from copying the court in such a communication. Because of Mr. Wohlsifer’s failure to communicate with SMITH in the past (as earlier communicated to the court in the 13 January 2016 telephone hearing, for example, during which Judge McCoun clearly directed Mr. Wohlsifer to communicate with SMITH by telephone (at the least) with regard to the Stipulation on Injunction content).

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Defendant Pro Se's Notice of Violation of Stipulation on Injunction by Christopher Paris (Oxbridge)  
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, L.L.C. and  
CHRISTOPHER PARIS, individually.

Plaintiffs,

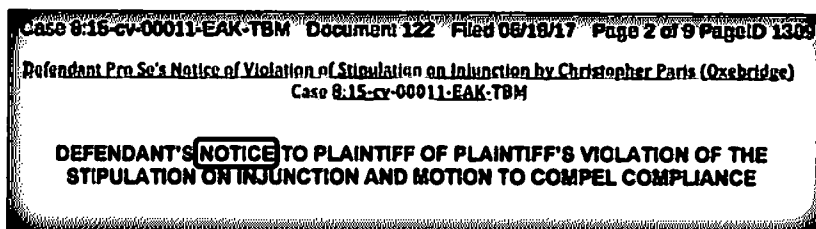
Vs.

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

Defendant

11 JUN 19 PM 1:46  
FILED  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

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SMITH gave PARIS (or his attorney) time to communicate with SMTH, and neither did so. They outright ignored the Notice of Breach.

In documents 122 and 123 SMITH felt it was important and appropriate to advise the Court that he had *attempted* to communicate the problem/complaint with/to PARIS directly and PARIS' attorney of record at the time. SMITH can find no law forbidding him from doing so. As in the past, no response was given by PARIS or his attorney of record at the time (who has since "jumped ship") by way of the court or any communication with SMITH of any kind. There has been no attempt by PARIS or whoever his current attorney was, or is today on this case, or was then, to address the NOTICE each received.

2. Documents 122 and 123 are proof of *compliance* with LR 3.01(g). Failure of PARIS and/or PARIS' attorney of record at the time to respond in any way (other than to "jump ship") shows that PARIS and/or PARIS' attorney failed to "...confer in good faith..." by US mail, by phone, or by any other method, and no response to the evidence presented to both PARIS and PARIS' attorney (past or present) in documents 122 and 123 has happened to this date. The only way SMITH could attempt to "FORCE" PARIS or his attorney to communicate was to provide evidence to the Court that he (SMITH) had attempted to do so.

**REQUEST OF THE COURT**

3. SMITH has no "Request of the Court" at this time. PARIS' continuing non-compliance with the Stipulation on Injunction is simply further, hilariously

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ruining his reputation with no help needed from the Court, especially PARIS' incoherent "rant" on LinkedIn which he also posted on his own public website (court docket document 122, Exhibit "D").

4. SMITH herein withdraws his *actual* "Motion" for the court to act (court docket document 129). As court docket documents 122, 123, and their exhibits, as well as, especially court docket document 128, are eliciting widespread ridicule of PARIS and his attorney Mr. Lorenzo, PARIS is self-destructing, especially in the aerospace and quality assurance industry in general. The fight between "GUBERMAN" and PARIS, as well as PARIS' Doxxing of the ASQ and Quality Digest (to name a couple of PARIS' "conspiracy agents"), is also continuing entertainment, as well as PARIS' new business method/model of soliciting donations to his "legal fund" on Fundrazr:

<https://fundrazr.com/profiles/oxebridge-quality-resources-international-llc> -

PARIS hasn't actually sued anyone or any company or organization as far as SMITH can tell, other than SMITH, but no doubt a "legal defense fund" is good "I done been wronged" income for PARIS, and it's evident that few people care (his garnering only US\$3810 over 101 weeks as of this date). Not to mention his miniscule 143 "Twitter followers".

PARIS declared chapter 7 bankruptcy to the tune of US\$650K in liabilities in 2016. PARIS continued attacks on people, companies and organization are serving to ensure he is on many "black lists".

Copied from PARIS' LinkedIn rant (copied from docket document 122, Exhibit "D").

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**Our critics number only four. *Four*. That's it. But empowered with the internet, these four men can become formidable trolls. Backed up by backwards-thinking bureaucrats at ASQ HQ and Quality Digest, each with tens of thousands of dollars in ad revenue, they are hard nuts to crack.**

**We can only hope the US justice system will prevail and eventually the bad actors will be properly punished through the courts. We can only hope the advertisers of their backers will realize the damage to their brands and do the right thing. We can only hope that more people with inside knowledge of these trolls and their actions come forth and provide additional evidence to support the ongoing litigation.**

**In the mean time, you can help. Consider a donation to the ISO Standards Users Legal Defense Fund, which is used to not only help push for reform in the ISO standards scheme, but also to defend against these horrific attacks by morally bankrupt monsters. Click here to donate, if you can.**

**If you can't, don't worry, just hold on until we can get our site back up and safe, and feel free to tell the bad actors you're sick of their antics.**

“Bad actors”? “Trolls” (PARIS’ communications specialty these days on the internet)? Four people are out to get PARIS? Four “little guys” (Smith, Guberman {who is taunting PARIS everywhere, including on YouTube}, Levinson {who is currently suing PARIS for libel} and who knows who the 4<sup>th</sup> “person” is,) and they are backed by the ASQ and Quality Digest (as if the ASQ and Quality Digest could care less, much less would want to fund these four people?), is just fantasy (aka Fake News” at best).

This is pure comedy. Many of us really love PARIS’ “*We can only hope that more people with inside knowledge of these trolls and their action come forth and provide additional evidence to support ongoing litigation.*”? What a laughable farce... There isn’t any now, never has been and never will be. Mr. Paris, you’ll be waiting forever. You can’t get “evidence” of something that doesn’t exist. People with “inside knowledge”? Is this a major conspiracy? No one gives a hoot, much less the ASQ and Quality Digest (or any other person, organization or company) about PARIS. Mr. PARIS is an internet Troll. A Doxxer. Everyone knows it, but none are in the least interested in paying a company, much less any

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person, to disparage PARIS. No one cares anymore, and for all intents and purposes no one ever has. What good will PARIS once had with many companies and organizations is now gone and he is persona non-gratia.

**SUMMARY**

- A. A Court Order "Denying" a *Notice of Breach* (court docket document 122) to PARIS and his attorney is not a Court function unless the Judge Kovachevich is implying she has the authority to forbid communication with SMITH and PARIS' attorney, and does so by means of an order which in effect would make LR 3.01(g) moot in this case. SMITH is not aware of any law which *prohibits* SMITH from keeping the court informed of his **Notice of Breach** and **attempt** to communicate with PARIS and his attorney of record at the time in an attempt to provide the court with evidence of compliance with LR 3.01(g).
- B. PARIS' attorney has yet to respond to Judge McCoun's request for a response to court docket documents 122 and 123 (court docket document 126, last paragraph). PARIS' current attorney, Mr. Lorenzo, did reply obliquely in docket document 128 by rehashing what has already been settled in court docket document 121 and other documents related to the 16 March 2016 hearing in Tampa, but in no way, anywhere in the document 128 did PARIS' attorney address court docket document 128 by specifically responding to court docket document 122. Mr. Lorenzo's response was essentially "Well, Smith didn't do this, and Smith is doing that", all of which was total fabricated assertions, and/or rehashing other already settled issues, or related to GUBERMAN who SMITH neither knows nor has any control over what GUBERMAN posts or where he posts what ever he posts.

Mr. Lorenzo has the nerve to assert that SMITH has any responsibility for

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what GUBERMAN posts? Apparently so – Court docket document 128 pages 4, 5, 7, 8, 9 and 10).

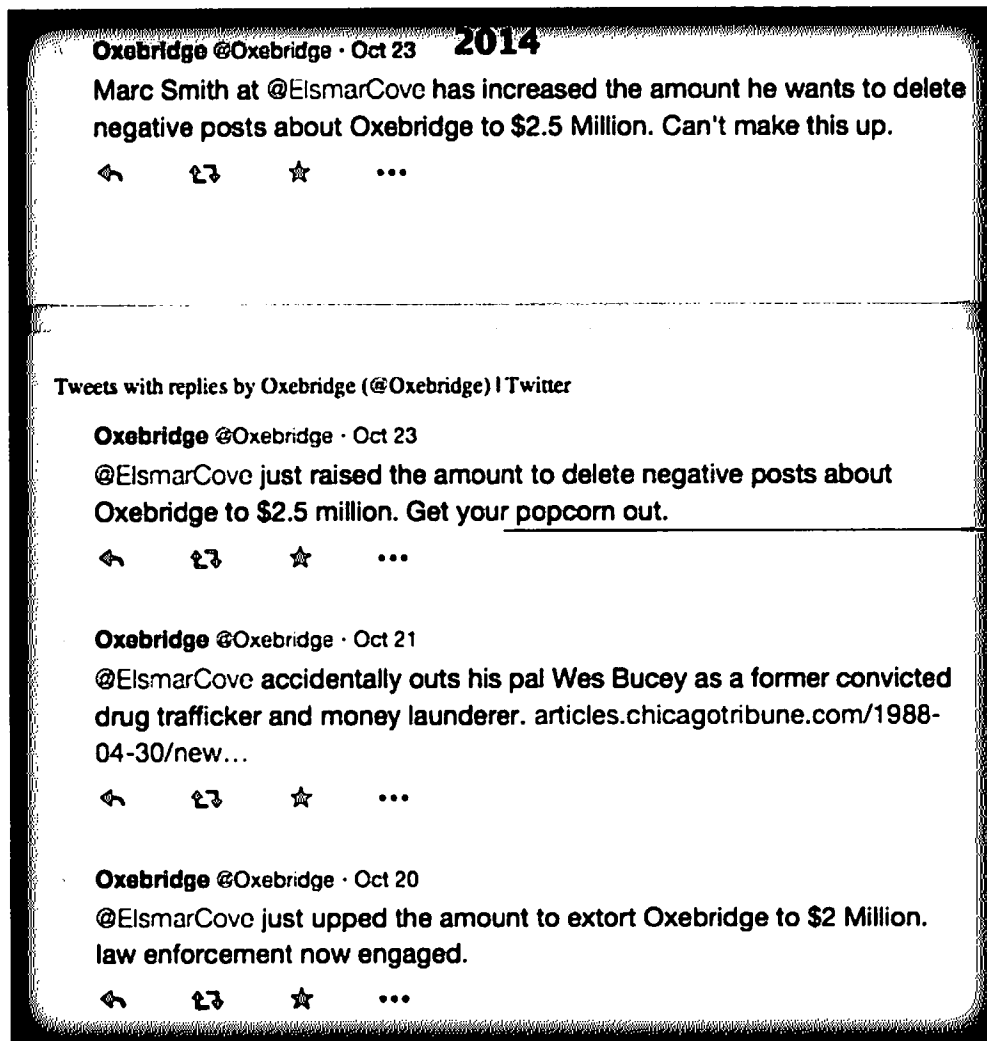
It is baldly obvious that Mr. Lorenzo has not read the 16 March 2016 hearing transcript which PARIS' "substitute attorney" twice feverously attempted to hide (court docket documents 84 and 86) asking for the hearing transcript to be sealed in "emergency" motions.

Mr. Lorenzo's response was a total "Smoke Screen", yet the court appears to have accepted this garbage submission (court docket document 128). This type of submission is what lawyers are allowed to submit to the court? A degreed lawyer? Amazing!

- C. Either the Court cares or it doesn't. It appears it doesn't as it has taken no action with regard to Judge McCoun's order of 08/01/2017. There has been no reply, nor can SMITH understand the logic of "Note 1". If Mr. Lorenzo had a legal duty to notify SMITH of his appearance as council in this case (which SMITH assumes is the case, and if not why Note 1) and did not do so, why did the court allow it? If Mr. Lorenzo was *supposed* to do so, but didn't, why did Judge McCoun not reject it until SMITH was notified giving SMITH the option of objecting to a change of attorney? Theater? This reeks of "Well, you were supposed to notify SMITH, but you didn't, but it really doesn't matter. You're a lawyer so I'll forgive your breaking the law – SMITH wasn't made aware of it so it doesn't matter, I approve anyway." This is law? No – This is theater. SMITH and others do not have to be law school graduates to recognize jiggery pokery when we see it.
- D. This is all a charade of law, a totally frivolous, federal civil tort *nuisance* lawsuit from the beginning. Filed under 450 "Commerce" this has been

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nothing more than PARIS wanting to eliminate a "Google search result" of a 33 post, 3 month discussion from 2001, essentially a discussion (people expressing opinions) of his advertising tactics and model – Way beyond the statute of limitations. Read SMITH's answer to the complaint (court docket document 17). That this court allowed that lawsuit to proceed is – Well, I guess anyone can pay the US\$400 filing fee and file a totally frivolous complaint. There was no "competition", SMITH having essentially retired in 2001ish, and there certainly wasn't a trademark issue. As has been introduced into evidence multiple times in numerous court filings, PARIS was already "baiting" SMITH in the fall of 2014:



There was, of course, never any "extortion", and "law enforcement" was



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never involved, but PARIS, a bald faced liar, publically claimed such. Then again, with his meager 143 "Twitter followers", very, very few people read his libelous "tweets" anyway...

- E. Court docket document 128 is an example of absurdity. Mr. Lorenzo accuses SMITH of being "parisoxebridge" and "Anonymous IM8Ep6R0NR"(and something else - hard to keep track) in paragraph 9. Not only is there no proof of this, it has been speculated that PARIS himself posted the cited documents, among other things such as posing as "Rob-Oxebridge", to cast suspicions on SMITH much as PARIS did in his LinkedIn "post" (aka "rant") accusing "Elsmar" (Marc Smith, of course) of DDoSing his Oxebidge website (*and, oh so many other things*), a totally unfounded, knowingly false accusation (aka: libel - pure and simple). It's quite a rant, and rash of unfounded, and knowingly false, accusations and innuendo against several people and organizations. PARIS is quite a writer... No doubt PARIS would claim "Free Speech", but libel is well defined as "Knowingly false" accusations / public postings in which PARIS engages in quite frequently.

Knowing what SMITH now knows about "hearings", SMITH would tear PARIS apart on the witness stand. And SMITH believes it is quite evident why Mr. Wohlsifer wasn't at the hearing having hired an outsider to act as "co-council" for the 16 March 2015 hearing in Tampa. Mr. Wohlsifer wanted to take no chance of the judge asking him any questions so he sent a substitute who knew essentially nothing about the case.

- F. And since Judge McCoun instructed the participants (Mr. Wohlsifer and SMITH) to exchange evidence at least 5 days *prior* to the 16 March 2016 Tampa hearing, and PARIS' lawyer provided nothing *until the day of the hearing*, SMITH can only assume he, as well, need not provide any evidence

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to be presented prior to the hearing even if the Judge "requires" this prior to the hearing - Even if the Judge says it is required it obviously isn't required. More legal "theatrics". "Require" it (the 13 January 2016 telephone hearing), but when it doesn't happen, allow the "evidence" anyway. This is law? What ever it is, it definitely isn't impartial and allows an attorney to ignore the judge's order. This is how "law" works?

- G. This is not to mention Mr. Lorenzo's statements that documents posted to "DocFoc.com" and "Dockslide.us" were all "sealed" documents. Few, if any, of the documents had *ever* been sealed to begin with. Documents may have been removed from "DocFoc.com", "Scribd" and "Dockslide.us" by PARIS (an embarrassment, I know) or his attorney, but they ARE **public** documents and *anyone can post them wherever they like*. SMITH has no control over public documents which were and are shared around the internet. They are posted in many places these days, and are being passed between people as .pdf files. The horse is out of the barn. It left the barn the day the lawsuit was filed and served. PARIS "sowed the wind" by filing the lawsuit to begin with, and is reaping the whirlwind of his action. Mr. Wohlsifer's betrayal of PARIS in the 13 January 2016 telephone hearing pretty much says it all. As PARIS' representative Mr. Wohlsifer agreed that all documents would be made public, including the Mediation Settlement agreement.
- H. That a lawyer filed court docket document 128 without so much as a miniscule amount of review, much less actual evidence, makes a mockery of the law profession. We can all throw mud against the wall, and it is apparently what some lawyers do in submissions to courts. This is no more than a lawyer's game.

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- I. SMITH also reminds Mr. Lorenzo that *had he reviewed the transcript of the 13 January 2016 telephone hearing with Judge McCoun*, (due diligence in representing his client PARIS) when asked, directly, by Judge McCoun Mr. Wohlsifer agreed and did not object to **all** documents, *including the Mediation Settlement Agreement*, being made public. Mr. Wohlsifer effectively "sold Paris out" to total public scrutiny way back then. While it did take several months or so for the court to actually instruct the court clerk to unseal the documents, by the time the relatively few sealed documents were posted in various places they had *already been made public*. Mr. Lorenzo's inclusion of assertions such as this are puzzling since he can not even prove who "Rob-Oxebridge", "parisoxebridge" and "Anonymous IM8Ep6R0NR" are. As has been shown in several earlier documents, PARIS hacked his own website so PARIS himself is not above suspicion.

Oh, and Mr. Lorenzo my name is Marc Timothy Smith, not Marc Anthony Smith (lack of attention to detail ({imagine that!}...)). And FYI, although this lawsuit is/was also filed against "Cayman Business Systems" which has not existed since 2001 when DBAs in Ohio were no longer allowed. (Just trying to "bring you up to speed" on this). That's how flawed this whole bogus lawsuit has been from day 1.

- J. SMITH has little doubt that the court might now seal the entire case to avoid further embarrassment to all involved. As I said above, the proverbial horse is out of the barn, however, and all of the court documents have been distributed far and wide. So be it, seal it, as it will only go to prove how silly this all has been (and is).
- K. At this point SMITH doesn't care that PARIS is violating the Stipulation of Injunction. PARIS is only making himself out to be a fool and a liar.

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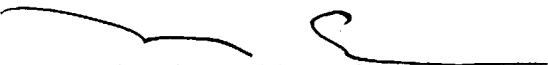
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**CERTIFICATE OF SERVICE**

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.

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 27<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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