

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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

Plaintiffs,

CASE NO.: 8:15-CV-11-T-17TBM

vs.

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

Defendants.

**NOTICE OF SUBMITTING EVIDENCE SUPPLEMENTAL TO ORDER FOR DEFENDANT TO
SHOW CAUSE HEARING HELD ON MARCH 16, 2015**

COMES NOW the plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC and CHRISTOPHER PARIS cumulatively (“plaintiffs”) by and through their undersigned attorney, and file this Notice of Submitting Evidence Supplemental to Order for Defendant to Show Cause hearing held on March 16, 2015 and states as follows:

1. On March 16, 2016, a hearing on Order to Show Cause was held before the Honorable Judge Thomas B. McCoun.
2. At said hearing, testimony was heard from both plaintiff and defendant.
3. At said hearing, the Court ordered the plaintiff and defendant to produce additional evidence demonstrating what efforts had been made on the part of the defendant and plaintiff to remove postings in violation of the Mediated Settlement Agreement from www.google.com and www.reddit.com.
4. Additionally, this Court ordered plaintiff to produce evidence of any “letter” given to defendant pursuant to section 1(2)(C) of the Meditated Settlement Agreement made between the parties.

5. Plaintiff states that no such letter was produced to defendant, as post-settlement correspondence and research with www.google.com and www.reddit.com revealed that a letter signed by the defendant was not the proper method for removing material from either site. Thus, would have been a fruitless act. (See communications inquiring how to remove content with www.reddit.com and www.google.com attached hereto as Exhibits A and B respectively)
6. The correspondence between plaintiff www.reddit.com and www.google.com demonstrates that there are established methods for each website that the defendant has failed to use to remove content, thus in violation of the Mediated Settlement Agreement.

WHEREFORE, Plaintiffs, CHRISTOPHER PARIS and OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, ask that this Honorable Court to admit these exhibits into evidence to be considered in this Court's deliberation on the Order for the Defendant to Show Cause and to grant such other relief this Honorable Court deems equitable and just under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served upon defendants via U.S. Mail to Marc Timothy Smith, 8466 LeSourdsville-West Chester Road, Olde West Chester, Ohio 45069, on this 22nd day of March.

Respectfully submitted by:

WOHLSIFER & BOONE, PLLC

By: /s/ Leighanne C. Boone

Leighanne Boone, Esquire

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