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VIA EMAIL AND US MAIL

May 6, 2011

[REDACTED]
KATYSEXPOSURE

[REDACTED]
Katy, TX 77449-6577

Re: KELMAN v. KRAMER

San Diego Superior Court case no. 37-2010-00061530-CU-DF-NC

[REDACTED]

This firm represents Dr. Bruce Kelman in the above-referenced lawsuit. As I suspect you are aware, Dr. Kelman obtained a judgment for libel against Sharon Kramer after a trial in 2008, and recently obtained a preliminary injunction against her in the above referenced action. Copies of the judgment and preliminary injunction are attached for your reference.

Please be advised that if you republish the defamatory matter, we will pursue you personally to the fullest extent permitted by law.

Very truly yours,


Keith Scheuer

KS/sel

Encs.

FILED
Clerk of the Superior Court

SEP 24 2008

By: M. GARLAND, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT

BRUCE J. KELMAN, GLOBALTOX, INC., Plaintiffs,) CASE NO. GIN044539) Assigned for All Purposes to:) HON. LISA C. SCHALL) DEPARTMENT 31) UNLIMITED CIVIL CASE) Case filed: May 16, 2005
v.)
SHARON KRAMER, and DOES 1 through 20, inclusive, Defendants.) ^{mg.} [PROPOSED] JUDGMENT)) Trial Date: August 18, 2008) Department: N-31)

This action came on regularly for trial by jury on August 18, 2008, with Plaintiffs appearing in person and by Keith Scheuer, Esq. of Scheuer & Gillett, and Defendant appearing in person and by Lincoln Bandlow, Esq. of Spillane Shaeffer Aronoff Bandlow. A jury of 12 persons was duly impaneled and sworn, witnesses testified, and after being duly instructed by the Court, the jury deliberated and thereon duly returned the following special verdicts:

1 1. That Defendant Sharon Kramer acted wrongly by
2 making the following statement: "Dr. Kelman altered his under
3 oath statements on the witness stand" while he testified as a
4 witness in an Oregon lawsuit; that Kramer made the above
5 statement to persons other than Kelman; that the persons to
6 whom the statement was made reasonably understood that the
7 statement was about Bruce Kelman; that persons who read the
8 statement reasonably could have understood it to mean that
9 Kelman had committed the crime of perjury or testified
10 falsely while on the witness stand; that the statement was
11 false; that Kelman proved, by clear and convincing evidence,
12 that Kramer knew the statement was false, or had serious
13 doubts about the truth of the statement; and that Kelman be
14 awarded a monetary sum of nominal damages in the amount of
15 \$1.00 (one dollar and no cents).
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18 2. That Kramer made the statement to persons other
19 than GlobalTox, Inc., and that the persons to whom the
20 statement was made did not reasonably understand that the
21 statement was about GlobalTox.
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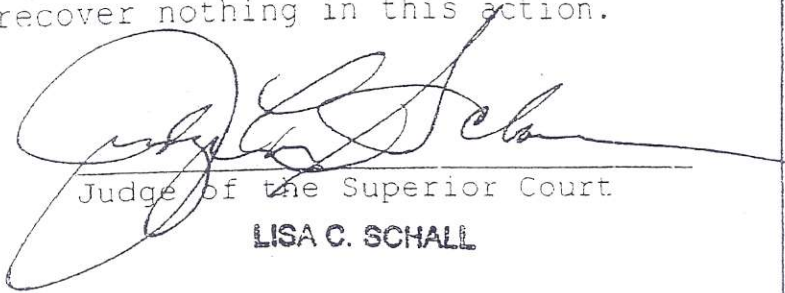
23 NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that
24 Plaintiff Bruce Kelman recover the sum of \$1.00 (one dollar
25 and no cents) as nominal damages from Defendant Sharon
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mganard 12/18/08.

Kramer, and costs in the amount of \$ 7,252.65, and that
Plaintiff GlobalTox, Inc. recover nothing in this action.

Dated: 9/24/08


Judge of the Superior Court
LISA C. SCHALL

1 PROOF OF SERVICE

2
3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action. My business address is 4640 Admiralty Way, Suite 402,
5 Marina Del Rey, California 90292. On August 28, 2008, I served the foregoing
6 **[PROPOSED] JUDGMENT** on the interested parties in this action by placing a true copy
7 thereof enclosed in a sealed envelope addressed as follows:

8 Lincoln D. Bandlow, Esq.
9 David Aronoff, Esq.
10 SPILLANE SHAEFFER ARONOFF BANDLOW
11 1880 Century Park East, Suite 1004
12 Los Angeles, California 90067-1623
13 Attorney for Defendant Sharon Kramer

F I L E D
Clerk of the Superior Court

SEP 24 2008

By: M. GARLAND, Deputy

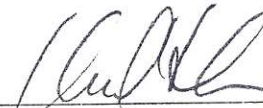
14 [X] BY MAIL – I caused each such envelope with postage thereon fully prepaid to be
15 placed in the United States mail at Marina Del Rey, California. I am “readily familiar” with
16 the firm’s practice of collection and processing correspondence for mailing. Under that
17 practice, it would be deposited in the U.S. Postal Service on that same day with postage
18 thereon fully prepaid at Marina Del Rey, California in the ordinary course of business. I am
19 aware that on motion of the party served, service is presumed invalid if postal cancellation
20 date or postage meter date is more than one day after date of deposit for mailing in affidavit.

21 [] BY PERSONAL SERVICE – I delivered by hand such envelopes to the offices of
22 the addressees.

23 [] BY FACSIMILE—I sent such document from facsimile machine (310) 301-0035 on
24 August 28, 2008. I certify that said transmission was completed and that all pages were
25 received and that a report was generated by said facsimile machine that confirms the
26 transmission and receipt. I thereafter mailed a copy to the interested party by placing a true
27 copy thereof enclosed in a sealed envelope addressed to the party listed above.

28 EXECUTED on August 28, 2008 at Marina Del Rey, California.

[X] (STATE) – I declare under penalty of perjury under the laws of the State of
California that the foregoing is true and correct.


Keith Scheuer

1 SCHEUER & GILLETT, a professional corporation
2 Keith Scheuer, Esq. Cal. Bar No. 82797
3 4640 Admiralty Way, Suite 402
4 Marina Del Rey, CA 90292
5 (310) 577-1170
6 Attorney for Plaintiff
7 BRUCE J. KELMAN

F I L E D
Clerk of the Superior Court

MAY 02 2011

BY A. L. W.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT

BRUCE J. KELMAN,) CASE NO.:
Plaintiff,) 37-2010-00061530-CU-DF-NC

v.) Assigned for All Purposes to:
HON. THOMAS P. NUGENT
DEPARTMENT: N-30

SHARON KRAMER, and DOES 1)
through 20, inclusive,) UNLIMITED CIVIL CASE

Defendants.) [APRIL 27, 2011 REVISED
PROPOSED] PRELIMINARY
INJUNCTION

Hearing Dates: April 1 and 14,
2011

Department: N-30

This matter came on regularly for hearing on April 1,
2011, in Department N-30 of the above Court, the Honorable
Thomas P. Nugent, Judge presiding. Keith Scheuer, Esq. of
Scheuer & Gillett appeared on behalf of Plaintiff Bruce J.
Kelman. Defendant Sharon Kramer appeared on her own behalf.
On April 14, 2011, the Court heard plaintiff Bruce J.
Kelman's ex parte application to correct a clerical error in
the minute order and took the matter under submission.

1 The Court, having taken the matter under submission and
2 having fully considered the arguments of all parties, both
3 written and oral, as well as the evidence presented, rules
4 as follows:

5
6 IT IS HEREBY ORDERED that, during the pendency of this
7 action, defendant Sharon Kramer is enjoined and restrained
8 from stating, repeating or publishing, by any means
9 whatsoever, the following statement:

10 "Dr. Kelman altered his under oath statements on the
11 witness stand" while he testified as a witness in an
12 Oregon lawsuit.

13 IT IS FURTHER ORDERED that, before this order may take
14 effect, plaintiff Bruce J. Kelman must file a written
15 undertaking in the sum of \$5,000 as required by California
16 Code of Civil Procedure section 529, for the purpose of
17 indemnifying the defendant for the damages she may sustain
18 by reason of the issuance of this preliminary injunction if
19 the Court finally decides that the plaintiff is not entitled
20 to it. The preliminary injunction shall issue on plaintiff's
21 filing of such written undertaking.

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23 The Court reserves jurisdiction to modify this
24 injunction as the ends of justice may require.

25 MAY 0 22011

26 THOMAS P. NUGENT
27 Judge of the Superior Court

MAY 02 2011

PROOF OF SERVICE

BY A. LUM

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 4640 Admiralty Way, Suite 402, Marina Del Rey, California 90292. On April 27, 2011, I served the foregoing [APRIL 27, 2011 REVISED PROPOSED] PRELIMINARY INJUNCTION on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Sharon Kramer
2031 Arborwood Place
Escondido, CA 92029

[X] BY MAIL – I caused each such envelope with postage thereon fully prepaid to be placed in the United States mail at Marina Del Rey, California. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited in the U.S. Postal Service on that same day with postage thereon fully prepaid at Marina Del Rey, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[] BY FACSIMILE—I sent such document from facsimile machine (310) 301-0035 on April 27, 2011. I certify that said transmission was completed and that all pages were received and that a report was generated by said facsimile machine that confirms the transmission and receipt. I thereafter mailed a copy to the interested party by placing a true copy thereof enclosed in a sealed envelope addressed to the party listed above.

EXECUTED on April 27, 2011 at Marina Del Rey, California.

[X] (STATE) – I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Keith Scheuer