

1       *"In her press release, Appellant stated: 'Upon viewing documents presented by*  
2       *the Haynes [sic] attorney of Kelman's prior testimony from a case in Arizona,*  
3       *Dr. Kelman altered his under oath statements on the witness stand. He admitted*  
4       *The Manhattan Institute, a national political think-tank, paid GlobalTox \$40,000*  
5       *to write a position paper regarding the potential health risks of toxic mold*  
6       *exposure.'" [sic, omitted, for the position statement of the US Chamber of*  
7       *Commerce]*

8       **THIS COURT IS AWARE THAT MR. KELMAN AND MR SCHEUER WANT**  
9       **MRS. KRAMER GAGGED FROM BEING ABLE TO WRITE OF HOW PRIOR**  
10       **COURTS AND MR. SCHEUER FRAMED HER FOR LIBEL OVER THE WORDS,**  
11       **"altered his under oath statements"**

12       In the original complaint of this case filed in November of 2010, Mr. Kelman wanted  
13       Mrs. Kramer gagged from writing the following as illustrated by the original proposed  
14       Temporary Injunctive Relief Order which states:

15       *"The libelous passage of the press release states: 'Dr. Bruce Kelman of GlobTox, Inc,*  
16       *a Washington based environmental risk management company, testified as an expert*  
17       *witness for the defense, as he does in mold cases through the country. Upon viewing*  
18       *documents presented by the Hayne's [sic] attorney of Kelman's prior testimony from a*  
19       *case in Arizona, Dr. Kelman altered his under oath statements on the witness stand. He*  
20       *admitted the Manhattan Institute, a national political think tank, paid GlobalTox*  
21       *\$40,000 to write a position paper regarding the potential health risks of toxic mold*  
22       *exposure."*

23       The Court is aware that they wanted Mrs. Kramer gagged from writing absolutely true  
24       statements of how it became a false concept in US public health policy that it was  
25       scientifically proven moldy buildings do not harm, with the prior courts framing her for  
26       libel for the truthful words. This is evidenced by the fact that this Court understood Mrs.  
27       Kramer's writing accurately stated the think-tank money was for the US Chamber Mold  
28       Statement and did not grant Mr. Kelman's request that Mrs. Kramer could be gagged by  
29       temporary injunctive relief order "TIRO" from writing all of the above.

30       Instead, the Court granted a TIRO containing the five words for which Mrs. Kramer was  
31       sued and framed for libel, *"altered his under oath statements"* while gagging her from  
32       writing a sentence that is not even in Mrs. Kramer's writing of March 2005. This Court  
33       ordered by TIRO that Mrs. Kramer' be enjoined from writing,

1       *“Dr. Kelman altered his under oath statements on the witness stand’ when he*  
2       *testified in a trial in Oregon.” [sic, that based solely on his toxicology model, he*  
3       *professed it was proven the Haynes children’s illnesses “Could not be” caused by*  
4       *mold toxins]*

5       **MR. KELMAN DID COMMIT PERJURY – IN KELMAN & GLOBALTOX V.**  
6       **KRAMER TO ESTABLISH FALSE THEME FOR MALICE**

7       Within the Retraction proposed by Mr. Kelman, it states that Mrs. Kramer is to sign  
8       under penalty of perjury, *“I do not believe that Dr. Kelman committed perjury. I apologize*  
9       *to Dr. Kelman and is colleagues at VeriTox, Inc. for all the statements that I have made that*  
10       *stated or implied otherwise.”* The only words for which Mrs. Kramer has been sued and  
11       deemed by the courts to be a malicious liar are *“altered his under oath statements”*. In libel  
12       law one must establish a reason for malice. The undisputed evidence in both libel cases is  
13       that Mr. Kelman committed perjury to establish a false theme for Mrs. Kramer to harbored  
14       malice for him. He submitted declarations three times which falsely stated that when  
15       retained as an expert defense witness in Mrs. Kramer’s mold litigation (2002-03) he had  
16       testified the *“types and amount of mold in the Kramer house could not have caused the life*  
17       *threatening illnesses she claimed.”* His attorney then wrote as a false reason of why Mrs.  
18       Kramer was writing of the fraud in US public health policy, *“Apparently furious that the*  
19       *science conflicted with her dreams of a remodeled home, Kramer launched into an*  
20       *obsessive campaign to destroy the reputation of Dr. Kelman and GlobalTox.”*

21       All courts suppressed Mrs. Kramer’s uncontroverted evidence that Mr. Kelman gave no  
22       such malice causing testimony in Mrs. Kramer’s mold litigation, including declarations  
23       submitted by attorneys involved in the case. All courts ignored the fact that there was not a  
24       single piece of evidence presented that Mrs. Kramer was in the least unhappy with Mr.  
25       Kelman’s involvement in her own mold litigation. All courts ignored the evidence that  
26       Mrs. Kramer received approximately \$500K in settlement from the case.

27       On July 15, 2011, Mrs. Kramer asked this Court that Mr. Kelman’s attorney be made to  
28       corroborate the reason given for malice – as no court in the prior case would make him and  
all suppressed the evidence that he was perjury to establish needed theme for malice.