

-----Original Message-----

From: [AllWebCo Billing Department](#)

Date: 2/8/2013 12:02:46 AM

To: [REDACTED EMAIL ADDRESS]

Cc: enlightenmefree@enlightenmefree.com

Subject: enlightenmefree.com

Hello,

We have received a temporary restraining order from the Superior Court of the state of Washington for Thurston County to have you immediately remove the material described below from your site, or shut the site down pending trial.

The court clarifies its previous order granting Temporary Restraining Order as follows:

Defendants, their agents, employees, attorneys and all persons in concert with them are immediately enjoined from continuing to display or otherwise disseminate RSE information or material, including but not limited to audio recordings or video footage of classes, lectures, meetings, speeches, teachings, or other gatherings organized or presented by JZK, Inc or RSE without the express written consent of JZK, Inc. Any video or other material or information currently posted or displayed by said individuals on any internet website or others forum where it can be accessed by others is to be immediately removed.

If we do not hear back from soon, we will be forced to disable your site to comply with the court order.

Please confirm receipt of this email and removal of the above materials.

Thank you,

Jan

AllWebCo



REQUEST FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS

DEMANDE
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ETRANGER
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE

Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.

Convention relative 'a la signification et 'a la notification 'a l'etranger des actes judiciaires ou extrajudiciaires en matiere civile ou commerciale, signee 'a La Haye, le 15 Novembre 1965.

Identity and address of the applicant
Identite et adresse du requerant

Gordon Thomas Honeywell LLP
1201 Pacific Avenue, Suite 2100
Tacoma, WA 98402, USA

Address of receiving authority
Adresse de l'autorite destinataire

Ministry of the Attorney General
Ontario Court of Justice
393 Main St. P.O. Box 1208
Haileybury Ontario, P0J1K0, CANADA

**The undersigned applicant has the honour to transmit-in duplicate-the documents listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,
(identity and address)**

Le requerant soussigne a l'honneur de faire parvenir-en double exemplaire-a l'autorite destinataire les documents ci-dessous enumeres. en la priant conformement a l'article 5 de la Convention precitee, d'en faire remettre sans remettre un exemplaire au destinataire, savoir:
(identite et adresse)

ALLWEBCO.NET

96 Mowat Ave. Toronto, ON M6K 3M1, CANADA

- ☒ (a) in accordance with the provisions or sub-paragraph (a) of the first paragraph of article 5 of the Convention.*
a) selon les formes legales (article 5 alinea premier, lettre a).
- ☐ (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)*:
b) selon la forme particuliere suivante (article 5, aline'a premier, lettre b) :
- _____
- ☐ (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)*:
c) le cas echeant, par remise simple (article 5, alinea 2).

The authority is requested to return or to have returned to the applicant a copy of the documents-and of the annexes--with a certificate• a provided on the reverse side.

Cette autorite est prie de renvoyer ou de faire renvoyer au requerant un exemplaire de l'acte-et de ses annexes -avec l'attestation figurant au verso.

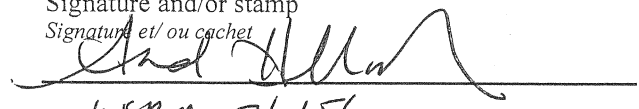
List of documents

Enumuration der pieces

Subpoena Duces Tecum

Done at Tacoma, Washington USA, the 4th of Jan. 2013
Fait 'a _____, le _____

Signature and/or stamp
Signature et/ ou cachet


WSBA 36156

*Delete if inappropriate
Rayer les mentions inutiles.

CERTIFICATE
ATTESTATION

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,
L'autorite soussignée a l'honneur d'attester conformiment 'a l'article 6 de ladite Convention.

1) that the document has been served *

1. que la demande a été exécutée

-the (date) -le (date)

-at (place, street, number) -a (l'adresse, rue, numéro)

--in one of the following methods authorized by article 5-

--une des formes suivantes prévues à l'article 5

☐ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention*.
a) selon les formes prévues (à l'article 5, alinéa premier, lettre a)

☐ (b) in accordance with the following particular method:

b) selon la forme particulière suivante:

☒ (c) by delivery to the addressee, who accepted it voluntarily.*

-c) par remise en main propre

The documents referred to in the request have been delivered to:

Les documents mentionnés dans la demande ont été remis à

-(identity and description of person)

-l'identité et la description de la personne

-relationship to the addressee family, business or other

-liens de parenté de subordination ou autres, avec le destinataire de l'acte

2) that the document has not been served, by reason of the following facts*:

2. que la demande n'a pas été exécutée, en raison des faits suivants:

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in The attached statement*

Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint.

Annexes

Annexes

Documents returned:

pièces renvoyées

In appropriate cases, documents establishing the service:

Le cas échéant, les documents justificatifs de l'exécution:

Done at _____, the _____
Fait à _____, le _____

Signature and/or stamp.
Signature et/ou cachet.

SUMMARY OF THE DOCUMENT TO BE SERVED
ELEMENTS ESSENTIELS DE L'ACTE

Convention on the service abroad of judicial and extrajudicial documents In civil or commercial matters, signed at The Hague, November 15, 1965.

Convention relative 'a la signification e t a la notfrarion ~ l'e'stranger ties acres judiciaries et extrajudiciaries en matiere civile ou commerciale, signgee a La Haye, le 15 Novembre 1965.,

(article 5, fourth paragraph)
(article 5. aline a 4)

Name and address of the requesting authority:

Nom ei addressee tie l'autorite requirante:

Gordon Thomas Honeywell LLP 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402, USA

Particulars of the parties:

Identite des parties:

JZK, Inc. v. VIRGINA COVERDALE; JOHN DOES 1-20 AND JANE DOES 1-20.

JUDICIAL DOCUMENT
ACTE JUDICIAL IRE

Nature and purpose of the document:

Nature et obiet tie l'acte-

Subpoena for documents

Nature and purpose of the proceedings and, where appropriate, the amount in dispute:

Nature et objet de l'instance le cas echeant le montant du litige:

JZK, Inc. v. VIRGINA COVERDALE; JOHN DOES 1-20 AND JANE DOES 1-20, a civil case, No. 12-2-02241-8.

Date and place for entering appearance-

Date el lieu de la comparution:

Please provide documents to Gordon Thomas Honeywell LLP 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402, USA by Jan. 25,

Court which has given judgment:**

Jurisdiction qui a rendu la deci sion:

Dale of judgment:**

Date de /a decision:

Time limits stated in the document:**

Indication des delias figurant dans l'acte:

EXTRAJUDICIAL DOCUMENT
ACTE EXTRAJUDICIAIRE

Nature and purpose of the document:

Nature et objet l'acte:

Time limits stated in the document:**

Indication des delias figurant dans l'acte:

Andrea McNeely
Direct: (253) 620-6486
E-mail: AMcNeely@gth-law.com

January 4, 2013

ALLWEB.CO.NET
96 Mowat Ave.
Toronto, ON M6K 3M1, Canada

RE: JZK, Inc. v. Coverdale, Thurston County Sup. Ct. No. 12-2-02241-8

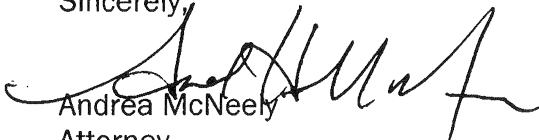
To whom it may concern:

This letter is accompanied by a subpoena duces tecum in the above referenced matter. I have also enclosed an order for preliminary injunction issued by the Hon. James Dixon on November 14, 2012. The Plaintiff in this matter seeks information directly relevant to identifying the individuals responsible for disseminating Plaintiff's proprietary materials and information. The nature of Plaintiff's proprietary interest in the disseminated materials and information is reflected in the enclosed order. Due to the absence of publically available information, the Plaintiff is unable to positively identify the account holder(s) through any other means and is reliant on your assistance in this matter.

As you will see, the accompanying subpoena does not request the contents of any email messages or other communications sent to or from the users described in the subpoena. If you construe any requests made herein to be protected by any applicable laws, or you are for other reasons unable or unwilling to comply with the request, please contact me directly to discuss the matter.

Due to the perishable nature of the originating IP address logs, we respectfully request that you make every effort to expedite this request to avoid the deletion of extremely important IP address log evidence held by the yet to be identified originating ISP.

Sincerely,



Andrea McNeely
Attorney

Enclosures: Subpoena Duces Tecum
Order Granting Preliminary Injunction

Reply to:

Tacoma Office
1201 Pacific Ave., Suite 2100
Tacoma, WA 98402

(253) 620-6500
(253) 620-6565 (fax)

Seattle Office

600 University, Suite 2100
Seattle, WA 98101

(206) 676-7500
(206) 676-7575 (fax)

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

JZK, Inc., a Washington corporation,

Plaintiff,

vs.

VIRGINA COVERDALE; JOHN DOES 1-20 AND
JANE DOES 1-20, also known as Enlighten Me
Free,

Defendants.

NO. 12-2-02241-8

SUBPOENA DUCES TACUM

ASSIGNED TO THE HONORABLE JAMES
DIXON

TO: ALLWEBCO.NET
Contact Privacy Inc. Customer 013226774
96 Mowat Ave.
Toronto, ON M6K 3M1, Canada

☐ YOU ARE COMMANDED to appear in the Superior Court of the State of Washington at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified to testify at the taking of a deposition in the above case.

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. CR 30(b)(6).

PLACE OF DEPOSITION	DATE AND TIME
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SUBPOENA DUCES TACUM - 1 of 4

(12-2-02241-8)

[100057284.docx]

COPY

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or tangible things at the place, date, and time specified below:

This production request applies to the following records and evidence: Registrant Information, IP Logs, Billing Records, Email Addresses, and Identifying Information associated with the following:

1. URL: <http://www.enlightenmefree.com/>, usernames 1. Ockahm 2. Rooster 3. Vanilla 4. Ex 5. Joe Sz 6. Tree 7. Freemysoul 8. Sad Grandfather 9. Robair 10. Virginia 11. Kelku 12. Kensho 13. Preatenna 14. seriously 15. Eddie 16. WofthensunEofthemoon 17. California Dreamin 18. Marie 19. Dove 20. Jingz 21. Michell 22. Lost In Space 23. Maroni 24. Naturegirl 25. Wakeup-Call 26. Cheryl 27. Delavie 28. FreeNow 29. LeonPaulos 30. Nachoman 31. outonalimb 32. RoyGBiv 33. Amanda124 34. EMF Webmaster 35. JD Jones 36. Justwow 37. Phill 38. PonySong.

Insomuch as possible, please produce the following information for the above service, including but not limited to:

- a. Date account was established;
 - b. Name of users that established the account, and are current owners or bill-payers for the account;
 - c. Address, phone numbers of users that established the account, and are current owners or bill-payers for the account;
 - d. Additional email addresses, phone numbers, physical addresses associated with the account;
 - e. Media Access Control address (MAC address) for each connection/session;
 - f. Type of account associated with the IP address, i.e. Dynamic or Static IP.
2. Please provide a detailed record of every IP address that has been allocated to the above user/customer 6 months prior and up to the date of receipt of this request, together with the precise date and time that such IP addresses changed.

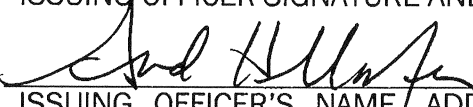
PLACE	DATE AND TIME
GORDON THOMAS HONEYWELL LLP 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402	January 25, 2013

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
SUBPOENA DUCES TACUM - 2 of 4 (12-2-02241-8) [100057284.docx]	

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

--	--

ISSUING OFFICER SIGNATURE AND TITLE  Attorney for Plaintiff	DATE 1/4/13
---	----------------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER Andrea McNeely, WSBA No. 36156 GORDON THOMAS HONEYWELL LLP 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402 (253) 620-6500 (206) 620-6565 FACSIMILE	DATE
--	------

PROOF OF SERVICE	
DATE SERVED	PLACE
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

CR 45, Sections (c) & (d)

(c) Protection of Persons Subject to Subpoenas

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce and all other parties, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance;

SUBPOENA DUCES TACUM - 3 of 4

(12-2-02241-8)

[100057284.docx]

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

(ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this rule;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies;
or

(iv) subjects a person to undue burden, provided that, the court may condition denial of the motion upon a requirement that the subpoenaing party advance the reasonable cost of producing the books, papers, documents, or tangible things.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or.

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

4

FILED
SUPERIOR COURT
THURSTON COUNTY, WA

2012 NOV 30 AM 9:28

BETTY J. GOULD, CLERK

☐ EXPEDITE
☐ Hearing is set:

Date: November 30, 2012

Time: 9:00 a.m.

Judge/Calendar: James Dixon

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

JZK, INC., a Washington corporation,

Plaintiff,

v.

VIRGINIA COVERDALE; JOHN DOES 1-20 and
JANE DOES 1-20, also known as ENLIGHTEN
ME FREE,

Defendants.

NO. 12-2-0224108

PRELIMINARY INJUNCTION ORDER

[PROPOSED]

THIS MATTER comes before the Court on Plaintiff JZK, Inc.'s Motion for Preliminary Injunction. The Court has considered the pleadings filed herein, the following pleadings and papers filed herewith and heard oral argument on November 14, 2012:

1. JZK, Inc.'s Motion for Temporary Restraining Order;
2. Declaration of John Michael Wright in Support of JZK, Inc.'s Motion for Temporary Restraining Order and exhibits thereto;
3. JZK, Inc.'s Memorandum in Support of Preliminary Injunction;
4. Declaration of John Michael Wright in Support of Preliminary Injunction;
5. Declaration of David Champagne in Support of Preliminary Injunction;
6. Virginia Coverdale's Response to Order to Show Cause;
7. Declaration of Eugene Volokh submitted by Virginia Coverdale;

PRELIMINARY INJUNCTION ORDER - 1 of 4
(12-2-0224108)
[100054245 (3).docx]

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

COPY

- 1 8. Plaintiff's Memorandum Regarding Prior Restraints on Speech; and
2
3 9. The Temporary Restraining Order issued by this Court on November 1,
4 2012.

5 _____
6 _____
7 _____
8 together with the Complaint and Answer filed in this matter, and being fully advised;

9 Based on the evidence and arguments presented, the Court finds that:

- 10 1. Plaintiff JZK, Inc.'s students sign an agreement not to teach or otherwise
11 disseminate through speeches, books, articles, media interviews, or other forms
12 of mass or group distribution any information or techniques learned or taught at
13 Ramtha's School of Enlightenment ("RSE") without the prior written consent of
14 the School. Defendants also agreed in writing not to assist or facilitate other
15 persons in doing so.
16
17 2. JZK, Inc. students also agree not to copy, reproduce, prepare adaptations,
18 publicly distribute, publicly perform, or publicly display any RSE materials
19 without the prior written consent of the School.
20
21 3. Defendant Coverdale and individual Doe defendants are former students of
22 RSE and signed the agreement described in paragraphs 1 and 2 above.
23
24 4. RSE materials and information have been uploaded onto a public website by
25 Defendant Coverdale and individual Doe defendants. The material is covered
26 by the agreement.
27
28 5. Plaintiff has demonstrated a clear legal right on which it has a likelihood of
29 success on the merits.
30
31 6. Plaintiff has a well-grounded fear of immediate invasion of that right resulting
32 in actual or substantial injury for which there may be no adequate remedy at
33 law.
34
35 7. The balance of harms weighs in favor of granting preliminary injunctive relief.

1 IT IS HEREBY ORDERED that Plaintiff's Motion for Preliminary Injunction is
2 GRANTED. A Preliminary Injunction, as set forth below, is hereby issued pending trial:

3 1. Defendants, their agents, employees, attorneys, and all persons in concert with
4 them are immediately enjoined from copying, reproducing, preparing adaptations,
5 publicly distributing, publicly performing, publicly displaying or otherwise disseminating
6 (including without limitation internet postings) RSE information or materials, including but
7 not limited to audio recordings or video footage of classes, lectures, meetings, speeches,
8 teachings, or other gatherings organized or presented by JZK, Inc. or RSE without the
9 express written consent of JZK, Inc.
10

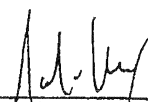
11 2. The Court clarifies its previous order granting Temporary Restraining Order as
12 follows: Defendants, their agents, employees, attorneys, and all persons in concert with
13 them are immediately enjoined from continuing to display or otherwise disseminate RSE
14 information or materials, including but not limited to audio recordings or video footage of
15 classes, lectures, meetings, speeches, teachings, or other gatherings organized or
16 presented by JZK, Inc. or RSE without the express written consent of JZK, Inc. Any video or
17 other material or information currently posted or displayed by said individuals on any
18 internet website or other forum where it can be accessed by others is to be immediately
19 removed.
20

21 3. Defendants, their agents, employees, attorneys, and all persons in concert with
22 them are immediately enjoined from *assisting in or facilitating* the copying, reproducing,
23 preparing adaptations, publicly distributing, publicly performing, publicly displaying or
24 otherwise disseminating (including without limitation internet postings) RSE information
25 or materials, including but not limited to audio recordings or video footage of classes,
26

1 lectures, meetings, speeches, teachings, or other gatherings organized or presented by
2 JZK, Inc. or RSE without the express written consent of JZK, Inc.

3
4 4. Defendants shall continue to preserve, protect, and maintain all hard copies
5 and electronic data reflecting all communications and records of any kind relating to the
6 allegations in Plaintiff's Complaint.

7 SIGNED this 30 day of November 2012.

8
9 
JUDGE JAMES J. DIXON

10 Presented by:

11 GORDON THOMAS HONEYWELL LLP
12 Attorneys for Plaintiff JZK, Inc.

13 By 

14 Andrea H. McNeely, WSBA 36156
15 Eric D. Gilman, WSBA No. 41680

16 SKELLENGER BENDER, PS
17 Jeffrey C. Grant, WSBA No. 11046
18 Co-Attorneys for Plaintiff JZK, Inc.

19 Approved by:

20 By 

21 Shawn Timothy Newman
22 Attorney at Law, Inc., P.S. WSBA 14193