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6 Attorney for Plaintiffs
7 BRUCE J. KELMAN and GLOBALTOX, INC.

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

9 BRUCE J. KELMAN,) CASE NO. BC
10 GLOBALTOX, INC.,) Assigned for All Purposes to:
11 Plaintiffs,) HON.
12) DEPARTMENT
13 v.) UNLIMITED CIVIL CASE
14 SHARON KRAMER, and DOES 1)
15 through 20, inclusive,) COMPLAINT FOR LIBEL
16 Defendants.)
17)

17 Plaintiffs BRUCE J. KELMAN (hereafter "KELMAN") and
18 GLOBALTOX, INC. (hereafter "GLOBALTOX") complain against
19 Defendants as follows:

20 FIRST CAUSE OF ACTION
21 (Libel Against All Defendants)

- 22 1. Plaintiff BRUCE J. KELMAN (hereafter "KELMAN") is
23 an individual who resides in the State of Washington.
24 2. Plaintiff GLOBALTOX, INC. (hereafter "GLOBALTOX")
25 is a corporation organized and existing under the laws of the
26 State of Washington, with its principal place of business in
27

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1 8. Commencing on or about March 9, 2005, Defendants
2 published and distributed written press releases that falsely
3 implied that KELMAN and GLOBALTOX provided perjurious
4 testimony in lawsuits and stated that KELMAN, while working
5 for GLOBALTOX, "altered his under oath statements" while
6 testifying on the witness stand in an Oregon lawsuit.
7 Defendants posted these statements on various online message
8 boards and internet sites, including ToxLaw.com and
9 ArriveNet.com.
10

11 9. Such statements are false, and are libelous on
12 their face. They expose Plaintiffs to hatred, contempt,
13 ridicule, and obloquy, and tend to injure Plaintiffs in their
14 business, in that such statements accuse Plaintiffs of
15 providing false testimony under oath, and engaging in
16 dishonest and criminal conduct.
17

18 10. These defamatory statements were seen and read by
19 persons across the United States and elsewhere who visited
20 the above-referenced message boards and internet sites.
21

22 11. As a proximate result of Defendants' wrongful
23 publication, Plaintiffs have suffered loss to their
24 reputation, shame and mortification, all to their general
25 damage in an amount to be proved at trial.

26 12. In addition, as a further proximate result of the
27 above-described publication, Plaintiffs have suffered special
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