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Attorneys for Plaintiff

STC (Tele)
6/29/2016
@ 3pm
FILED
6-29-16 3:30pm.
MICHAEL K. JEANES, Clerk
By T. DeRaddo
T. DeRaddo, Deputy

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MARICOPA**

8
9 MEGAN WELTER an individual;

10 Plaintiff,

11 v.

12 JOHN and JANE DOES 1-10 are fictitious
13 persons who may have an interest herein.
14 ABC PARTNERSHIPS 1-10; XYZ
15 CORPORATIONS 1-10; and DEF
16 LIMITED LIABILITY COMPANIES 1-10,
17 Defendants.

NO. CV2016-004734

**STIPULATED ORDER FOR
PERMANENT INJUNCTION**

18 Pursuant to stipulation of the Parties, and good cause appearing therefore, IT IS
19 ORDERED, ADJUDGED AND DECREED that:

20 1. Plaintiff is awarded a permanent injunction against enjoining Defendant
21 Ryan McMahon, from publishing false and defamatory statements concerning Plaintiff,
22 and enjoining Plaintiff from publishing false and defamatory statements concerning
23 Defendant Ryan McMahon, and compelling removal of the uniform resource locators
24 ("URLs") in **Exhibit A**, attached hereto.
25

26 2. Defendant and/or Defendant's Agents, affiliates, and/or other
27 person/entity assisting or enabling Defendant's publication of the below-referenced
28 Content (collectively "Defendant's Agents"), shall immediately remove from all

1 websites, search engines, forums, blogs, lists, social media sites, and/or other forums
2 of mass communication (collectively "Forums"), all negative statements, material,
3 and/or information pertaining to Plaintiff and/or any agent/affiliate thereof (the
4 "Content"), including, but not limited to, the Content located at the following URLs,
5 attached as **Exhibit A**, and/or any variations thereof, as well as any search terms
6 and/or URLs that are related, directly or indirectly, or would be reasonably calculated
7 to lead, to the Content or any of the URLs.
8

9 3. Defendant admits that all or substantially all of the statements made in
10 the URLs are false and defamatory.
11

12 4. Defendant and/or Defendant's Agents shall immediately remove from all
13 Forums any and all Content, references to the Content, partial references to the
14 Content, and/or references to partial Content, including, but not limited to, indexing
15 URLs, index pages, subpages, inner pages, headers, headings, title tags, H1 tags,
16 meta tags, deep links, navigation menus, footers, filenames, ALT text parameters,
17 structured data, semantic data, images, PDFs, slideshows, multimedia files, and
18 search suggestions;
19

20 5. As it is foreseeable that the above-referenced URLs and/or Content will
21 be referenced on additional webpages in the future (as a result of indexing, re-
22 indexing, directory development, search result pages, etc.), Defendant and/or
23 Defendant's Agents shall immediately take all actions, including requesting removal
24 of the URLs from all Internet search engines, including, but not limited to,
25 Google, Yahoo!, and Bing, to remove all such webpages and cache from the
26 Internet, such that the Content is rendered unsearchable;
27
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1 6. To the extent Defendants and/or Defendants' Agents are unable to
2 remove any Content from any Forum, Defendants and/or Defendants' Agents shall
3 immediately take all reasonable actions requested by Plaintiffs to assist Plaintiffs in
4 removing such Content and/or having the Content rendered unsearchable;

5 7. The Parties and their Agents shall not post any Content, defamatory or
6 negative material or information about each other and/or any agent/affiliate thereof on
7 any Forum;

8 8. The Parties and their Agents shall not publish (orally in writing) any
9 Content, defamatory or negative material or information about Plaintiffs and/or any
10 agent/affiliate thereof to any third party; and

11 9. All Parties shall be deemed to have appeared and waive all objections to
12 jurisdiction. The Court shall retain jurisdiction to the extent it is necessary to amend this
13 order, *until the matter is dismissed.*

14 DATED this 29th day of JUNE, 2016.

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19 _____
20 The Honorable Patricia Starr, Judge
21 Maricopa County Superior Court
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APPROVED AS TO
FORM AND CONTENT



Dated: 5/19/2016

Ryan McMahon
c/o 8283 N. Hayden Road, #229
Scottsdale, AZ 85258



Dated: 5/20/2016

Megan Welter

KELLY / WARNER, PLLC

/s/ Raeesabbas Mohamed

Raeesabbas Mohamed, Esq.
8283 N. Hayden Rd., Suite 229
Scottsdale, Arizona 85258
Attorney for Plaintiff

COPY of the foregoing filed
electronically on this same date with
the Clerk of the Superior Court.

COPY of the foregoing
mailed on this same date to:

Ryan McMahon


c/o 8283 N. Hayden Road, #229
Scottsdale, AZ 85258

/s/ Anne E. Griffith

Anne E. Griffith