IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

HALDEN ZIMMERMANN)	CASE NO. CV-16-006184
Plaintiff,)	JUDGE COLLEEN O'DONNELL
VS.)	
JOHN DOE,)	
Defendant.)	

ORDER GRANTING SUMMARY JUDGMENT AND ENTRY OF PERMANENT INJUNCTION

This cause comes before the Court on the Motion for Summary Judgment of Plaintiff Halden Zimmermann ("Plaintiff"). Defendant, John Doe, did not file an objection. The Court finds that Defendant was previously served with a copy of the complaint by publication and therefore proper service was perfected on Defendant. Ohio Rule of Civil Procedure 4.4; R.C. 2703.14; *Smith v. Virginia*, Case No. A1505398, Hamilton C. P. (March 14, 2016) (injunctive relief judgment entered against John Doe defendant); *Hurford v. Registrant*, Case No. A150244, Hamilton C.P. (August 19, 2015) (same); *McGaffney v. Posters 1-5*, Case No. A1501577 (August 18, 2015) (same).

The complaint alleges claims of libel, libel *per se*, intentional inflection of emotional distress, and the torts of intrusion upon seclusion and publication of private facts related to statements posted on various internet websites that have caused Plaintiff reputational harm. Having reviewed the Motion for Summary Judgment, the supporting brief, affidavits and other evidentiary submissions, and viewing them in a light most favorable to Defendant, this Court finds that no genuine issue of material fact exists and that reasonable minds can come only to the

conclusion that Plaintiff is entitled to summary judgment against Defendant as a matter of law on the counts alleged in the complaint.

The court finds Defendant published defamatory statements of and concerning Plaintiff on the Internet that are false and defamatory (the "Defamatory Statements"). The Defamatory Statements include claims that Plaintiff engaged in criminal activity, sexual misconduct, illegal drug activity, violence, was fired, and other allegations of misconduct, all of which are false.

IT IS THEREFORE ORDERED that the following Permanent Injunction be entered:

PERMANENT INJUNCTION

IT IS ORDERED, ADJUDGED AND DECREED that John Doe ("Defendant"), including his agents, servants, employees, independent contractors, attorneys, representatives, and those persons or entities in active concert or participation with them, is mandated to take all action, including, but not limited to, removing the posts he made about Plaintiff from the respective webpages on which they appear and requesting removal from the Internet search engines including Google via its court order submission webpage https://support.google.com/legal/contact/lr courtorder?product=websearch&contact type=lr cou rtorder&rd=1, and Yahoo! Bing via their removal and request page at https://support.microsoft.com/en-

us/getsupport?oaspworkflow=start_1.0.0.0&wfname=capsub&productkey=bingcontentremoval &locale=en-us&ccsid=636001767228315550, to remove all defamatory, disparaging, libelous, and false statements about Plaintiff that Defendant posted on the Internet, but not limited to the statements Defendant made in the following URL addresses:

- 1. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com.whak.com/.../has-sex-with-s...
- 2. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com.whak.com/.../is-bankrupt/?...
- 3. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com/phantom-shitter
- 4. danaher.asshole.hal.is.popular.is.hot.is.popular.mediafetcher.com.whak.com/...

- 5. danaher.asshole.hal.is.popular.is.popular.is.hot.is.popular.wasarrested.com/phantom-shitter
- 6. danaher.asshole.hal.zimmerman.mediafetcher.com/news/top stories/
- 7. danaher.asshole.hal.zimmermann.ishomosexual.com/default.asp?type=mean
- 8. danaher.asshole.halden.is.hot.mediafetcher.com.addeffects.net/
- 9. danaher.asshole.halden.zimmermann.wasarrested.com.tossover.com/
- 10. danaher-asshole-a-halden-zimmermann.is-retarded.com/?type=mean
- 11. danaher-asshole-hal-is-popular-is-popular-is-hot-is-popular.is-addicted.com/
- 12. doxbox.squte.com/n/5315
- 13. forum.menstream.pl > Forum > Męski świat > Spor
- http://5.9.77.236/rec.bicycles.soc/FUCKING-VILOENT-PUNK-Halden-Zimmermann/1479
- 15. http://anti-matrix.org/Convert/Articles_Politics/Politics/Politics-Selected-Articles-140227181616.html
- 16. http://asshole.derrik.zimmermann.mediafetcher.com/news/top_stories/world_record
- 17. http://asshole.hal.zimmermann.is-a-jerk.com
- 18. http://asshole.hal.zimmermann.mediafetcher.com/news/top_stories/worldrec ord
- 19. http://asshole.hal.zimmermann.wasarrested.com/hacker
- 20. http://asshole.hal.zimmermann.wasarrested.com/phantom-shitter
- 21. http://asshole.halden.zimmermann.is-a-jerk.com
- 22. http://asshole.halden.zimmermann.wasarrested.com/hacker
- 23. http://asshole.halden.zimmermann.wasarrested.com/phantom-shitter
- 24. http://bbs.math.ncu.edu.tw/bmore?tv&4882
- 25. http://bbs.math.ncu.edu.tw/bmore?tv&4882
- 26. http://danaher.asshole.a.halden.zimmermann.is-a-jerk.com/
- 27. http://danaher.asshole.a.halden.zimmermann.wasarrested.com.whak.com/new/has-sex-with-sheep/?vn=Danaher+Asshole&vc=WHAK.com+NEWS+Report&vg=Homosexual
- 28. http://danaher.asshole.a.halden.zimmermann.wasarrested.com/
- 29. http://danaher.asshole.derrik.a.zimmermann.mediafetcher.com/news/top stories/worldrecord
- 30. http://danaher.asshole.derrik.zimmermann.mediafetcher.com/news/top stories/worldrecord
- 31. http://danaher.asshole.hal.a.zimmermann.is-a-jerk.com
- 32. http://danaher.asshole.hal.a.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 33. http://danaher.asshole.hal.a.zimmermann.wasarrested.com/hacker
- 34. http://danaher.asshole.hal.a.zimmermann.wasarrested.com/phantom-shitter
- 35. http://danaher.asshole.hal.zimmermann.is-a-jerk.com
- 36. http://danaher.asshole.hal.zimmermann.mediafetcher.com/news/top_stories/ worldrecord
- 37. http://danaher.asshole.hal.zimmermann.wasarrested.com/hacker
- 38. http://danaher.asshole.hal.zimmermann.wasarrested.com/phantom-shitter
- 39. http://danaher.asshole.halden.a.zimmermann.fansigngenerator.com/
- 40. http://danaher.asshole.halden.a.zimmermann.is-a-jerk.com
- 41. http://danaher.asshole.halden.a.zimmermann.wasarrested.com/hacker
- 42. http://danaher.asshole.halden.a.zimmermann.wasarrested.com/phantom-shitter
- 43. http://danaher.asshole.halden.zimmermann.is-a-jerk.com
- 44. http://danaher.asshole.halden.zimmermann.wasarrested.com/hacker
- 45. http://danaher.asshole.halden.zimmermann.wasarrested.com/phantom-shitter
- 46. http://danaher-asshole-a-halden-zimmermann.is-patriotic.com/country/muslim-terrorist-countries/

- 47. http://danaher-asshole-halden-a-zimmermann.is-addicted.com/
- 48. http://danaher-asshole-halden-a-zimmermann.is-addicted.com/
- 49. http://de.sci.chemie.narkive.com/ejrs670Z/workplace-bully-derrik-halden-zimmermann-is-a-fucking-punk
- 50. http://derrik.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 51. http://doxbox.squte.com/usenet/http-tinyurl.com-haldenzimmermann-fucking-punk
- 52. http://forum.menstream.pl/meski-swiat/asshole-derrik-halden-zimmermann-is-a-drunken-punk,882718.html
- 53. http://hal.zimmermann.is-a-jerk.com/
- 54. http://hal.zimmermann.mediafetcher.com/news/top stories/worldrecord
- 55. http://hal.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 56. http://hal.zimmermann.wasarrested.com/hacker
- 57. http://hal.zimmermann.wasarrested.com/phantom-shitter
- 58. http://halden.zimmermann.is-a-jerk.com/
- 59. http://halden.zimmermann.wasarrested.com/
- 60. http://halden.zimmermann.wasarrested.com/hacker
- 61. http://halden.zimmermann.wasarrested.com/phantom-shitter
- 62. http://halden.zimmermann.youarelame.com/
- 63. http://halden.zimmermann.youarelame.com/?
- 64. http://italia.forumszone.com/topic.aspx?topic_id=2069533
- 65. http://leica.asshole.a.halden.zimmermann.is-a-jerk.com/
- 66. http://leica.asshole.a.halden.zimmermann.mediafetcher.com.tossover.com/
- 67. http://leica.asshole.a.halden.zimmermann.wasarrested.com/hacker
- 68. http://leica.asshole.derrik.a.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 69. http://leica.asshole.derrik.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 70. http://leica.asshole.hal.a.zimmermann.is-a-jerk.com
- 71. http://leica.asshole.hal.a.zimmermann.mediafetcher.com/news/top_stories/ worldrecord
- 72. http://leica.asshole.hal.a.zimmermann.wasarrested.com.addeffects.net/new/is-gay/?vn=Leica+Asshole&vc=WHAK.com+Gayzine&vg=Transgender
- 73. http://leica.asshole.hal.a.zimmermann.wasarrested.com/hacker
- 74. http://leica.asshole.hal.a.zimmermann.wasarrested.com/phantom-shitter
- 75. http://leica.asshole.hal.a.zimmermann.youarelame.com/
- 76. http://leica.asshole.hal.zimmermann.is-a-jerk.com
- 77. http://leica.asshole.hal.zimmermann.mediafetcher.com/news/top_stories/wo_rldrecord
- 78. http://leica.asshole.hal.zimmermann.wasarrested.com/
- 79. http://leica.asshole.hal.zimmermann.wasarrested.com/hacker
- 80. http://leica.asshole.hal.zimmermann.wasarrested.com/phantom-shitter
- 81. http://leica.asshole.hal.zimmermann.youarelame.com
- 82. http://leica.asshole.hal.zimmermann.youarelame.com/
- 83. http://leica.asshole.hal.zimmermann.youarelame.com/name1.swf?name=Leica%20Asshole%20Hal%20Zimmermann&x&maxmus=1&x&
- 84. http://leica.asshole.hal.zimmermann.youarelame.com/name1.swf?name=Leica%20Asshole%20Hal%20Zimmermann&x&maxmus=4&x&
- 85. http://leica.asshole.hal.zimmermann.youarelame.com/name1.swf?name=Leica%20Asshole%20Hal%20Zimmermann&x&maxmus=4&x&
- 86. http://leica.asshole.hal.zimmermann.youarelame.com/name3.swf?name=Leica%20Asshole%20Hal%20Zimmermann&x&maxmus=4&x&

- 87. http://leica.asshole.halden.a.zimmermann.is-a-jerk.com
- 88. http://leica.asshole.halden.a.zimmermann.wasarrested.com/hacker
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- 90. http://leica.asshole.halden.zimmermann.is-a-jerk.com
- 91. http://leica.asshole.halden.zimmermann.wasarrested.com.whak.com/new/is-a-transvestite/?vn=Leica+Asshole&vc=WHAK.com+NEWS+Report&vg=Hermaphrodite
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- 93. http://leica.asshole.halden.zimmermann.wasarrested.com/
- 94. http://leica.asshole.halden.zimmermann.wasarrested.com/hacker
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- 101. http://publicgroups.org/misc.invest.options/derrik-halden-zimmermann-is-a-violent-dru/614835
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- 106. http://sfnet.fi/group.php?id=113991&newsgroup=sfnet.atk.linux&sid=
- 107. http://sfnet.fi/group.php?id=1224&newsgroup=sfnet.harrastus.sukututkimus&sid=
- 108. http://squte.com/usenet/http-tinyurl.com-haldenzimmermann-fucking-punk
- 109. http://squte.com/usenet/rotton-bastard-derrik-halden-zimmermann-violent-bully
- 110. http://tinyurl.com/derrikezimmermann
- 111. http://tinyurl.com/derrikzimmermann
- 112. http://tinyurl.com/haldenazimmermann
- 113. http://tinyurl.com/haldenzimmermann
- 114. http://usenetbrowseraccess.com/messaggio.php?num=21&ng_id=1634&offset=&show_headers=yes
- 115. http://vb.serverknecht.de/showthread.php?t=228833
- 116. http://vb.serverknecht.de/showthread.php?t=229710
- 117. http://vb.serverknecht.de/showthread.php?t=229933
- http://webcache.googleusercontent.com/search?q=cache:8tFw9ISRDF8J:www.is-a-jerk.com/flash/url.asp%3Fflash%3D5%26insult%3Doff%26destroy%3Dleica.asshole.hal.is.popular.is.popular.is.popular.wasarrested.com%253A80%252Fnew%252Fhas-sex-with-
- http://webcache.googleusercontent.com/search?q=cache:MhS9f6jEXXsJ:leica-asshole-halden-azimmermann.is-patriotic.com/country/muslim-terrorist-countries/+&cd=11&hl=en&ct=clnk&gl=us
- 120. http://webcache.googleusercontent.com/search?q=cache:rBKUoYEwuCAJ:www.is-a-jerk.com/flash/url.asp%3Fflash%3D32%26insult%3Doff%26destroy%3Dleica.asshole.hal.is.popular.is.popular.is.popular.wasarrested.com%253A80%252Fnew%252Fstatue-build-in-japan-that-resembles-local%252F%253Fvn%253DLeica%252BAsshole%2526vc%253DWHAK.com%252BReport%2526vg%253DHermaphrodite+&cd=7&hl=en&ct=clnk&gl=us
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- bankrupt%252F%253Fvn%253DLeica%252BAsshole%2526vg%253DCrook%2526vc%253DWHAK.co m%252BStock%252BExchange+&cd=8&hl=en&ct=clnk&gl=us
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- 123. http://www.basicinvestor.com/newsportal/miscinvest/article.php?id=34093&group=misc.invest.futures
- 124. http://www.danaher-asshole-hal-a-zimmermann.is-fat.com/aAbBpPhHiIoOuUlLtT
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- 129. http://www.ezz.dk/100005016-halden-zimmermann-is-a-violent
- 130. http://www.faretesto.com/halden-zimmermann-is-a-fucking-violent-t2660545
- 131. http://www.funnyjunk.com/search/profile/all/thumbs/desc/30/25?q=profile&from=www.WHAK.com
- 132. http://www.gogame.pw/2013/Dec/11/160992.html
- 133. http://www.groups.xorte.com/Leica-HOTHEAD-BULLY-Halden-Zimmermann,t,88765,8.html
- http://www.groups.xorte.com/MUTHA-FUCKER-Derrik-Halden-Zimmermann-is-a-WORKPLACE-BULLY%2Ct%2C88985%2C8.html
- 135. http://www.grupy.banzaj.pl/ASSHOLE,Derrik,Halden,Zimmermann,is,a,DRUNKEN,PUNK,17,1126586, 2 014 03.html
- 136. http://www.grupy.banzaj.pl/Danaher,HOTHEAD,Hal,Zimmermann,is,a,FUCKING,PUNK,20,136854,201 4 02.html
- http://www.grupy.banzaj.pl/http,www,ripoffreport,com,features,FUCKING,HOTHEAD,Halden,Zimmer m ann,24,745950,2014 03.html
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- 139. http://www.is-a
 - jerk.com/flash/url.asp?flash=32&insult=off&destroy=leica.asshole.hal.is.popular.is.popular.was arrested.com%3A80%2Fnew%2Fstatue-build-in-japan-that-resembles-
 - local%2F%3Fvn%3DLeica%2BAsshole%26vc%3DWHAK.com%2BReport%26vg%3DHermaphrodite
- 140. http://www.is-a
 - $jerk.com/flash/url.asp?flash=5\&insult=off\&destroy=leica.asshole.hal.is.popular.is.popular.is.popular.wasarrested.com%3\,A80\%2Fnew%2Fhas-sex-with-$
 - sheep%2F%3Fvn%3DLeica%2BAsshole%26vc%3DWHAK.com%2BNEWS%2BReport%26vg%3DHo m osexual
- 141. http://www.is-a
 - jerk.com/flash/url.asp?flash=69&insult=off&destroy=leica.asshole.hal.is.popular.is.popular.is.popular.was arrested.com%3A80%2Fnew%2Fis-
 - bankrupt%2F%3Fvn%3DLeica%2BAsshole%26vg%3DCrook%26vc%3DWHAK.com%2BStock%2BEx c hange
- 142. http://www.jlaforums.com/viewforum.php?f=258
- 143. http://www.jlaforums.com/viewtopic.php?t=216425043
- 144. http://www.jlaforums.com/viewtopic.php?t=220525797
- http://www.jlaforums.com/viewtopic.php?t=221337909
- 146. http://www.jlaforums.com/viewtopic.php?t=222161260
- 147. http://www.jlaforums.com/viewtopic.php?t=225648131
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- 153. http://www.werx.nl/rotton-bastard-derrik-halden-zimmermann-is-t375236
- 154. http://www.znaczacy.com/leica-asshole-halden-a-zimmermann-yes-t864497
- 155. https://groups.google.com/d/forum/hal-discuss
- 156. https://groups.google.com/d/forum/rec.boats.racing
- 157. https://groups.google.com/d/forum/rec.sport.paintball
- 158. https://groups.google.com/d/msg/alt.cellular.attws/Afwn.../mXsR4k9HnyMJ
- 159. https://groups.google.com/d/msg/alt.dbs.echostar/eucF43TV4nE/iwt003_j9KIJ
- 160. https://groups.google.com/d/msg/alt.tv.iron-chef/DIWOeXKPwao/6XEzZz82jqcJ
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- 162. https://groups.google.com/d/msg/be.telecom/gFEOXBj8H_s/JFwPM5WKGTAJ
- 163. https://groups.google.com/d/msg/es.rec.cine/iMzu_tgiw7k/fffhJTSrMUAJ
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- 165. https://groups.google.com/d/msg/rec.aviation.hang-gliding/FjVzr.../cCQo7L10_BYJ
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- 176. https://groups.google.com/d/topic/alt.cellular.cingular/Afwn D13HcM
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- 178. https://groups.google.com/d/topic/alt.drunken.bastards/jFbFw1cG9G0
- 179. https://groups.google.com/d/topic/alt.dss.tech/UamG44HCAgU
- 180. https://groups.google.com/d/topic/alt.english.usage/YgXnFn0aSII
- 181. https://groups.google.com/d/topic/alt.fan.cecil-adams/ZyFBOo2U7Rk
- 182. https://groups.google.com/d/topic/alt.fishing.catfish/zsTHnkj31IY
- 183. https://groups.google.com/d/topic/alt.music.new-order/rRxlMRSszNg
- 184. https://groups.google.com/d/topic/alt.non.sequitur/rJYw8h2YB-Q
- 185. https://groups.google.com/d/topic/alt.os.linux/nF34Rq9QzX0
- https://groups.google.com/d/topic/alt.os.linux/rLg9nZRpLLM
- 187. https://groups.google.com/d/topic/alt.satellite.gps/EGLqwSWWqKo
- 188. https://groups.google.com/d/topic/alt.tv.sopranos/3QEg-1Ut-dM
- 189. https://groups.google.com/d/topic/be.finance/ WKu5ns3GYY
- 190. https://groups.google.com/d/topic/be.politics/p6LTeBSxJrs
- 191. https://groups.google.com/d/topic/be.telecom/aQr4DQ-u1a4
- 192. https://groups.google.com/d/topic/be.telecom/ebfi-cqHH9M

- 193. https://groups.google.com/d/topic/chi.internet/GalxjC2Bgsg
- 194. https://groups.google.com/d/topic/de.sci.chemie/h4ppJ8p7Jv8
- 195. https://groups.google.com/d/topic/es.rec.cine/iMzu_tgiw7k
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- 373. https://groups.google.com/forum/#!topic/no.fritid.jakt/uRVj-6BXfTg
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- 376. https://groups.google.com/forum/#!topic/rec.boats.building/zsTHnkj31IY
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- 382. https://groups.google.com/forum/#!topic/rec.sport.paintball/X1gIkMy3HDo
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- 436. www.gdead.pw/2014/Jan/10/425161.html
- 437. www.gogame.pw/2013/Aug/20/160951.html
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- 439. www.grupy.banzaj.pl > pl.rec.motocykle
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- 441. www.hilpers.fr > rec.* > rec.cuisine
- 442. www.mombu.com/fishing/.../t-jerk-off-artist-halden-zimmermann-17895484.html
- 443. www.werx.nl/violent-punk-halden-a-zimmermann-fired-t375775

(collectively the "Posts" and attached in Exhibit A to this Order)

IT IS FURTHER ORDERED that Defendant is mandated, as it is foreseeable that the Posts and the statements contained thereon will be copied or referenced on additional webpages in the future, including but not limited to index, directory, and search results pages, to take all actions, including requesting removal from Internet search engines Google, Yahoo!, and Bing, to remove all such webpages from the Internet.

IT IS FURTHER ORDERED that Plaintiff is authorized to take all actions, including requesting removal from Internet search engines Google, Yahoo!, and Bing, to remove all such Posts from the Internet.

THE COURT REQUESTS Google, Yahoo!, and Bing to remove all associated webpages and URLs containing this defamatory content about Plaintiff from their respective search indexes.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Court enters the following findings of fact and conclusions of law:

I. Defendant's Posts Constitute Libel Per Se and Libel Per Quod

- A. Defendant published the Posts identified above and in Exhibit A. Included in Exhibit A are posts Defendant published that are false and defamatory and were published on the website "was arrested.com" ("WasArrested").
- B. The Was Arrested posts include, but are not limited to the following URLs:
 - http://danaher.asshole.a.halden.zimmermann.wasarrested.com.whak.com/new/has -sex-with-sheep/?vn=Danaher+Asshole&vc=WHAK.com+NEWS+Report&vg=Homosexua
 - 2. http://danaher.asshole.a.halden.zimmermann.wasarrested.com/
 - 3. http://danaher.asshole.hal.zimmermann.wasarrested.com/phantom-shitter
 - 4. http://danaher.asshole.halden.zimmermann.wasarrested.com/phantom-shitter
 - 5. http://halden.zimmermann.wasarrested.com/
 - 6. http://leica.asshole.hal.zimmermann.wasarrested.com/
 - 7. http://leica.asshole.hal.zimmermann.wasarrested.com/phantom-shitter
 - 8. http://leica.asshole.halden.zimmermann.wasarrested.com.whak.com/new/is-a-transvestite/?vn=Leica+Asshole&vc=WHAK.com+NEWS+Report&vg=Hermaph rodite
 - 9. http://leica.asshole.halden.zimmermann.wasarrested.com.whak.com/new/is-a-transvestite?vn=Leica+Asshole&vc=WHAK.com+NEWS+Report&vg=Hermaph rodite
 - 10. http://leica.asshole.halden.zimmermann.wasarrested.com/
 - 11. http://leica.asshole.halden.zimmermann.wasarrested.com/hacker
 - 12. http://leica.asshole.hal.zimmermann.wasarrested.com/hacker
 - 13. danaher.asshole.hal.is.popular.is.popular.is.hot.is.popular.wasarrested.com/phanto m-shitter
 - 14. danaher.asshole.halden.zimmermann.wasarrested.com.tossover.com/
 - 15. http://hal.zimmermann.wasarrested.com/hacker
 - 16. http://hal.zimmermann.wasarrested.com/phantom-shitter
 - 17. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com/phantom-shitter
 - 18. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com.whak.com/.../has-sex-with-s...
 - 19. danaher.asshole.hal.is.popular.is.hot.is.hot.wasarrested.com.whak.com/.../is-bankrupt/?...
 - 20. http://leica.asshole.a.halden.zimmermann.wasarrested.com/hacker
 - 21. http://danaher.asshole.hal.zimmermann.wasarrested.com/hacker
 - 22. http://danaher.asshole.hal.a.zimmermann.wasarrested.com/phantom-shitter
 - 23. http://danaher.asshole.hal.a.zimmermann.wasarrested.com/hacker
 - 24. http://danaher.asshole.halden.a.zimmermann.wasarrested.com/hacker
 - 25. http://danaher.asshole.halden.a.zimmermann.wasarrested.com/phantom-shitter
 - 26. http://danaher.asshole.halden.zimmermann.wasarrested.com/hacker
 - 27. http://leica.asshole.halden.a.zimmermann.wasarrested.com/phantom-shitter
 - 28. http://leica.asshole.halden.a.zimmermann.wasarrested.com/hacker

- 29. http://leica.asshole.hal.a.zimmermann.wasarrested.com/hacker
- 30. http://leica.asshole.halden.zimmermann.wasarrested.com/phantom-shitter
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- 32. http://halden.zimmermann.wasarrested.com/hacker
- 33. http://halden.zimmermann.wasarrested.com/phantom-shitter
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- 36. http://asshole.halden.zimmermann.wasarrested.com/hacker
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- 38. http://webcache.googleusercontent.com/search?q=cache:rBKUoYEwuCAJ:www.is-a-

jerk.com/flash/url.asp%3Fflash%3D32%26insult%3Doff%26destroy%3Dleica.as shole.hal.is.popular.is.po

pular.is.popular.wasarrested.com%253A80%252Fnew%252Fstatue-build-injapan-that-resembles-

local%252F%253Fvn%253DLeica%252BAsshole%2526vc%253DWHAK.com%252BReport%2526vg%253DHermaphrodite+&cd=7&hl=en&ct=clnk&gl=us

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jerk.com/flash/url.asp%3Fflash%3D69%26insult%3Doff%26destroy%3Dleica.as shole.hal.is.popular.is.po

pular.is.popular.wasarrested.com%253A80%252Fnew%252Fis-

bankrupt%252F%253Fvn%253DLeica%252BAsshole%2526vg%253DCrook%2526vc%253DWHAK.co

m%252BStock%252BExchange+&cd=8&hl=en&ct=clnk&gl=us

- 40. http://leica.asshole.hal.a.zimmermann.wasarrested.com.addeffects.net/new/is-gay/?vn=Leica+Asshole&vc=WHAK.com+Gayzine&vg=Transgender
- C. The following assertions made by Defendant in the WasArrested posts are false and defamatory, and include but are not limited to that Plaintiff:
 - 1. Was arrested
 - 2. Is a computer hacker
 - 3. Has sex with sheep
 - 4. Has sex with animals
 - 5. Attempted to hack into hundreds and maybe even thousands of pornographic websites
 - 6. Has been arrested on federal criminal charges
 - 7. Is also accused of credit card fraud
 - 8. Is currently being held in custody and is facing charges of 14 counts of public indecency for defecating in public
 - 9. Is a phantom shitter
 - 10. was arrested for drug crimes
 - 11. was convicted of crimes

- D. Defendant's assertions of fact about Plaintiff are false because, among other reasons:
 - 1. Plaintiff has never been arrested
 - 2. Plaintiff has never been charged with any crimes or convicted of any crimes
 - 3. Plaintiff is not a computer hacker
 - 4. Plaintiff has never engaged in computer hacking
 - 5. Plaintiff has never been arrested for drug crimes
 - 6. Plaintiff is not a phantom shitter
 - 7. Plaintiff does not have sex with sheep and has never engaged in bestiality
 - 8. Plaintiff never attempted to and never hacked into any websites
 - 9. Plaintiff has never been arrested on any criminal charges
 - 10. Plaintiff is not accused of credit card fraud and has never been charged or arrested for credit card fraud
 - 11. Plaintiff is not being held in custody currently and has never been held in custody
 - 12. Plaintiff is not facing charges of public indecency for any crimes and has never committed any crimes of public indecency
- E. Defendant published the Posts identified above and in Exhibit A. Specifically, Defendant published a false and defamatory post on the website "RipoffReport.com" ("RipoffReport"), at http://www.ripoffreport.com/r/Halden-Zimmermann/Buffalo-Grove-Illinois-60089/Halden-Zimmermann-is-a-VIOLENT-BAR-BRAWLER-aka-Halden-A-Zimmermann-Derrik-E-Zimmerman-1128244.
- F. The following assertions made by Defendant in the RipoffReport post are false and defamatory, and include but are not limited to that Plaintiff:
 - 1. picked a fight
 - 2. got into a bar brawl with another patron while attending the Leica National Sales meeting
 - 3. threw Drunken punches
 - 4. was the aggressor in a bar brawl
 - 5. was fired from his place of employment
 - 6. committed violent crimes
 - G. Defendant's assertions of fact about Plaintiff are false because, among other reasons:
 - 1. Plaintiff never got into a bar brawl at a national sales meeting, or any work event at all for that matter
 - 2. Plaintiff has never gotten into a bar brawl or any other fight
 - 3. Plaintiff never picked a fight
 - 4. Plaintiff was not fired from Leica Microsystems or any other company

- 5. Plaintiff did not and has never picked a fight with a bar patron or anyone else
- 6. Plaintiff has never been reprimanded by an employer for anything regarding arrogance, belligerence, or caustic attitudes
- 7. Plaintiff is not violent and has never been charged or arrested for anything regarding violence
- 8. Plaintiff has no criminal record, and has never been arrested or convicted for anything at all
- H. Defendant published posts on numerous groups.google.com pages ("GoogleGroups") about Plaintiff.
 - I. The posts are referenced below in the following URL links:
 - 1. https://groups.google.com/d/forum/hal-discuss
 - 2. https://groups.google.com/d/forum/rec.boats.racing
 - 3. https://groups.google.com/d/forum/rec.sport.paintball
 - 4. https://groups.google.com/d/msg/alt.cellular.attws/Afwn.../mXsR4k9HnyMJ
 - 5. https://groups.google.com/d/msg/alt.dbs.echostar/eucF43TV4nE/iwt003 j9KIJ
 - 6. https://groups.google.com/d/msg/alt.tv.iron-chef/DlWOeXKPwao/6XEzZz82jqcJ
 - 7. https://groups.google.com/d/msg/be.politics/p6LTeBSxJrs/kTtdId0TxDEJ
 - 8. https://groups.google.com/d/msg/be.telecom/gFEOXBj8H_s/JFwPM5WKGTAJ
 - 9. https://groups.google.com/d/msg/es.rec.cine/iMzu_tgiw7k/fffhJTSrMUAJ
 - 10. https://groups.google.com/d/msg/no.general/5opGq9eYG_I/Zsqlm8PlZioJ
 - 11. https://groups.google.com/d/msg/rec.aviation.hang-gliding/FjVzr.../cCQo7L10 BYJ
 - 12. https://groups.google.com/d/msg/rec.aviation.hang-gliding/FjVzr ro570/cCQo7L10 BYJ.
 - 13. https://groups.google.com/d/msg/rec.boats.racing/pY1NUObEqXI/vZVNJotLIbcJ
 - 14. https://groups.google.com/d/msg/rec.boats.racing/VERUF-4Odqo/rE70vItr3M4J
 - 15. https://groups.google.com/d/msg/sci.materials/zc9-kG7-Ehs/8iwfDsveBekJ
 - 16. https://groups.google.com/d/msg/sci.math/gBkuWRXwR9E/MLA6IZsL98EJ
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 - 23. https://groups.google.com/d/topic/alt.dbs.echostar/eucF43TV4nE.
 - 24. https://groups.google.com/d/topic/alt.drunken.bastards/jFbFw1cG9G0
 - 25. https://groups.google.com/d/topic/alt.dss.tech/UamG44HCAgU
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 - 29. https://groups.google.com/d/topic/alt.music.new-order/rRxlMRSszNg
 - 30. https://groups.google.com/d/topic/alt.non.sequitur/rJYw8h2YB-Q

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- 38. https://groups.google.com/d/topic/be.telecom/ebfi-cqHH9M
- 39. https://groups.google.com/d/topic/chi.internet/GalxjC2Bgsg
- 40. https://groups.google.com/d/topic/de.sci.chemie/h4ppJ8p7Jv8
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- 42. https://groups.google.com/d/topic/fr.rec.cuisine/9YlvFmeyulE
- 43. https://groups.google.com/d/topic/fr.rec.voyages/ZMeovLVHxHU
- 44. https://groups.google.com/d/topic/hr.alt.cellular.gsm.android/FeKVN6oVguI
- 45. https://groups.google.com/d/topic/it.arti.cinema/7FrrxsuD16w
- 46. https://groups.google.com/d/topic/no.general/5opGq9eYG I
- 47. https://groups.google.com/d/topic/no.general/5opGq9eYG I
- 48. https://groups.google.com/d/topic/pl.rec.dom/VQJcjY63iRo
- 49. https://groups.google.com/d/topic/pl.rec.telewizja/-U4DGvWkOv4
- 50. https://groups.google.com/d/topic/rec.arts.tv/c6gK3M6TnGM
- 51. https://groups.google.com/d/topic/rec.aviation.aerobatics/ZMeovLVHxHU
- 52. https://groups.google.com/d/topic/rec.aviation.balloon/8PURPihglJ0
- 53. https://groups.google.com/d/topic/rec.aviation.hang-gliding/FjVzr ro570
- 54. https://groups.google.com/d/topic/rec.boats.building/o 94q7kKxAo
- 55. https://groups.google.com/d/topic/rec.boats.building/zsTHnkj31IY
- 56. https://groups.google.com/d/topic/rec.boats.paddle/5oK-lDiNcVg
- 57. https://groups.google.com/d/topic/rec.boats.paddle/5oK-lDiNcVg
- 58. https://groups.google.com/d/topic/rec.boats.paddle/LOhB3oRGiAg
- 59. https://groups.google.com/d/topic/rec.boats.racing/pY1NUObEqXI
- 60. https://groups.google.com/d/topic/rec.boats.racing/TsdIux2rKFc
- 61. https://groups.google.com/d/topic/rec.boats.racing/VERUF-4Odqo
- 62. https://groups.google.com/d/topic/rec.equestrian/ZHnloqMMACQ
- 63. https://groups.google.com/d/topic/rec.motorcycles.dirt/yG8S-me6COA
- 64. https://groups.google.com/d/topic/rec.motorcycles/6kZv0KMrUQ0
- 65. https://groups.google.com/d/topic/rec.music.gdead/V9uWA-ZLrl0
- 66. https://groups.google.com/d/topic/rec.music.phish/-3BX313wJcs
- 67. https://groups.google.com/d/topic/rec.sport.curling/YxPRyzC7bWs
- 68. https://groups.google.com/d/topic/rec.sport.waterski/npuWActTAxk
- 69. https://groups.google.com/d/topic/sci.electronics.design/IPnjThJ xco
- 70. https://groups.google.com/d/topic/sci.math/gBkuWRXwR9E
- 71. https://groups.google.com/d/topic/sci.techniques.microscopy/dxTxM4CBu2k
- 72. https://groups.google.com/d/topic/sci.techniques.microscopy/FMfVoEwoHA0
- 73. https://groups.google.com/d/topic/sci.techniques.spectroscopy/aQr4DQ-u1a4
- 74. https://groups.google.com/d/topic/sk.general/Yhrs 6TbCh8
- 75. https://groups.google.com/d/topic/sk.rec.sport/s AzVPwXpqE
- 76. https://groups.google.com/d/topic/soc.men/iYsxPsfC3GA

- 77. https://groups.google.com/d/topic/soc.men/iYsxPsfC3GA
- 78. https://groups.google.com/d/topic/uk.rec.motorcycles/9yi1wMy6aAw
- 79. https://groups.google.com/d/topic/uk.rec.motorcycles/TqsW4uidmUA
- 80. https://groups.google.com/forum/#!forum/sci.techniques.microscopy
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- 252. https://groups.google.com/forum/?_escaped_fragment_=topic/rec.sport.jet ski/FMfVoEwoHA0
- 253. https://groups.google.com/forum/?hl=en#!topic/sci.electronics.design/IPnj ThJ xco
- 254. https://groups.google.com/forum/?hl=en&_escaped_fragment_=topic/sci.e lectronics.design/IPnjThJ xco
- 255. https://groups.google.com/forum/?hl=hy#!topic/alt.cellular.sprintpcs/Afw n D13HcM
- 256. https://groups.google.com/forum/embed/#!topic/rec.sport.paintball/X1gIk My3HDo
- 257. https://groups.google.com/forum/embed/?_escaped_fragment_=topic/rec.s port.paintball/X1gIkMy3HDo
- 258. https://groups.google.com/forum/m/#!msg/be.telecom/aQr4DQ-u1a4/zhGvZrBNtlQJ
- 259. https://groups.google.com/forum/m/#!topic/rec.boats.racing/pY1NUObEq XI
- 260. https://groups.google.com/forum/#!topic/soc.men/T1EqWvwRiBE
- 261. https://groups.google.com/forum/m/#!topic/sci.engr/IPnjThJ xco
- J. The assertions made by Defendant in the numerous GoogleGroups posts about Plaintiff are false and defamatory and include that Plaintiff:
 - 1. got into a bar brawl at a national sales meeting
 - 2. was fired from Leica Microsystems
 - 3. picked a fight with a bar patron after imbibing all evening long
 - 4. has arrogance, belligerence, and caustic attitude
 - 5. commits violence in the workplace
 - 6. is violent
 - 7. is a fucking punk
 - 8. is a bully,
 - 9. is a pervert
 - 10. is a Cocksucking kiddy diddler
 - 11. is an Asshole
 - 12. is a World champion masturbator
 - 13. Has a library of pornographic films
 - K. Defendant's assertions of fact about Plaintiff are false because, among other reasons:
 - 1. Plaintiff never got into a bar brawl at a national sales meeting, or any work event at all for that matter
 - 2. Plaintiff has never gotten into a bar brawl or any other fight
 - 3. Plaintiff was not fired from Leica Microsystems or any other company
 - 4. Plaintiff did not and has never picked a fight with a bar patron or anyone else
 - 5. Plaintiff has never exhibited arrogance, belligerence, or a caustic attitude

- 6. Plaintiff has never been reprimanded by an employer for anything regarding arrogance, belligerence, or caustic attitudes
- 7. Plaintiff is not violent and has never been charged or arrested for anything regarding violence
- 8. Plaintiff is not a punk
- 9. Plaintiff is not a bully and has never been reprimanded by any employer for bullying nor is there any other documented evidence of him bullying
- 10. Plaintiff has never engaged in bullying
- 11. Plaintiff is not a pervert and has never been charged, arrested, or cited for anything related to any perversions or anything else that could deem him a pervert
- 12. Plaintiff is not a "cocksucking kiddy diddler"
- 13. Plaintiff is not a "kiddy diddler", has never been arrested for being a "kiddy diddler" has never been charged with any crimes, convicted of any crimes, or arrested for anything involving pederasty
- 14. Plaintiff has no criminal record, and has never been arrested or convicted for anything at all
- 15. Plaintiff is not an asshole and has done nothing to exhibit character traits of being an "asshole"
- 16. Plaintiff is not a world champion masturbator
- 17. Plaintiff does not have a library of pornographic films or any pornographic films for that matter
- L. Defendant published false and defamatory posts on the website "is-a-jerk.com" (Is-a-Jerk) about Plaintiff.
 - M. The Is-a-Jerk posts are referenced below in the following URL links:
 - 1. http://danaher.asshole.a.halden.zimmermann.is-a-jerk.com/
 - 2. http://hal.zimmermann.is-a-jerk.com/
 - 3. http://halden.zimmermann.is-a-jerk.com/
 - 4. http://leica.asshole.a.halden.zimmermann.is-a-jerk.com/
 - 5. leica.asshole.halden.a.zimmermann.is-a-jerk.com/
 - 6. http://asshole.hal.zimmermann.is-a-jerk.com
 - 7. http://danaher.asshole.halden.a.zimmermann.is-a-jerk.com
 - 8. http://leica.asshole.hal.zimmermann.is-a-jerk.com
 - 9. http://leica.asshole.halden.zimmermann.is-a-jerk.com
 - 10. http://leica.asshole.hal.a.zimmermann.is-a-jerk.com
 - 11. http://leica.asshole.halden.a.zimmermann.is-a-jerk.com
 - 12. http://danaher.asshole.hal.zimmermann.is-a-jerk.com
 - 13. http://danaher.asshole.halden.zimmermann.is-a-jerk.com
 - 14. http://danaher.asshole.hal.a.zimmermann.is-a-jerk.com
 - 15. http://asshole.halden.zimmermann.is-a-jerk.com

- N. The assertions made by Defendant in the numerous posts about Plaintiff are false and include that Plaintiff:
 - 16. Is a jerk
 - 17. Was arrested
 - 18. Is addicted to drugs
 - 19. Is violent
 - 20. Was convicted of crimes
 - O. Defendant's assertions of fact about Plaintiff are false because, among other reasons:
 - 1. Plaintiff is not a jerk
 - 2. Plaintiff was not arrested and has never been arrested
 - 3. Plaintiff is not violent and has never been arrested for violence
 - 4. Plaintiff has never been charged with any crimes for violence or convicted of any crimes for violence
 - 5. Plaintiff has a clean criminal background record
- P. Defendant published false and defamatory posts on the website "is-addicted.com" (Is-Addicted" about Plaintiff.
 - Q. The Is-Addicted posts are referenced below in the following URL links:
 - 1. http://danaher-asshole-halden-a-zimmermann.is-addicted.com/
 - 2. danaher-asshole-hal-is-popular-is-popular-is-hot-is-popular.is-addicted.com/
 - 3. http://danaher-asshole-halden-a-zimmermann.is-addicted.com/
- R. The assertions made by Defendant in the numerous posts about Plaintiff are false and include that Plaintiff:
 - 1. Is addicted to drugs
 - 2. was addicted to drugs
 - 3. does drugs
 - 4. was arrested for drug charges
 - 5. was charged criminally with drug crimes
 - 6. was convicted of drug crimes
 - S. Defendant's assertions of fact about Plaintiff are false because, among other reasons:
 - 1. Plaintiff is not addicted to illegal drugs or any drugs
 - 2. Plaintiff does not use illegal drugs
 - 3. Plaintiff has never been arrested for any crimes involving drugs
 - 4. Plaintiff has a completely clean criminal background

- T. Defendant additionally published false and defamatory posts on numerous other websites which are included in Exhibit A and included here but not limited to the following URL Links:
 - 1. http://www.jlaforums.com/viewtopic.php?t=216425043
 - 2. http://www.jlaforums.com/viewtopic.php?t=220525797
 - 3. http://www.jlaforums.com/viewtopic.php?t=221337909
 - 4. http://www.jlaforums.com/viewtopic.php?t=222161260
 - 5. http://www.jlaforums.com/viewtopic.php?t=225648131
 - 6. http://www.jlaforums.com/viewforum.php?f=258
 - 7. http://5.9.77.236/rec.bicycles.soc/FUCKING-VILOENT-PUNK-Halden-Zimmermann/1479
 - 8. http://bbs.math.ncu.edu.tw/bmore?tv&4882
 - 9. http://de.sci.chemie.narkive.com/ejrs670Z/workplace-bully-derrik-halden-zimmermann-is-a-fucking-punk
 - 10. http://doxbox.squte.com/usenet/http-tinyurl.com-haldenzimmermann-fucking-punk
 - 11. http://forum.menstream.pl/meski-swiat/asshole-derrik-halden-zimmermann-is-a-drunken- punk,882718.html
 - 12. http://italia.forumszone.com/topic.aspx?topic_id=2069533
 - 13. http://sci.techniques.microscopy.narkive.com/zYJiLWl6/john-taulien-now-working-to-screw-things-up-at-leica
 - 14. http://sfnet.fi/group.php?id=113991&newsgroup=sfnet.atk.linux&sid=
 - 15. http://sfnet.fi/group.php?id=1224&newsgroup=sfnet.harrastus.sukututkimus&sid
 - 16. http://squte.com/usenet/http-tinyurl.com-haldenzimmermann-fucking-punk
 - 17. http://squte.com/usenet/rotton-bastard-derrik-halden-zimmermann-violent-bully
 - 18. http://usenetbrowseraccess.com/messaggio.php?num=21&ng_id=1634&offset=&show headers=yes
 - 19. http://vb.serverknecht.de/showthread.php?t=228833
 - 20. http://vb.serverknecht.de/showthread.php?t=229710
 - 21. http://vb.serverknecht.de/showthread.php?t=229933
 - 22. http://www.basicinvestor.com/newsportal/miscinvest/article.php?id=28127&group=misc.invest.options
 - 23. http://www.basicinvestor.com/newsportal/miscinvest/article.php?id=34093&group=misc.invest.futures
 - 24. http://www.ebosswatch.com/Reviews/Halden-A.-Zimmermann/1389463475
 - 25. http://www.edaboard.co.uk/halden-a-zimmermann-at-ametek-fucking-things-up-there-t553784.html
 - 26. http://www.eenyhelp.com/answer/hothead-derrik-halden-zimmermann-fucking-bastard-help-214310732.html
 - 27. http://www.ezz.dk/100005016-halden-zimmermann-is-a-violent
 - 28. http://www.faretesto.com/halden-zimmermann-is-a-fucking-violent-t2660545
 - 29. http://www.groups.xorte.com/Leica-HOTHEAD-BULLY-Halden-Zimmermann,t,88765,8.html

- 30. http://www.groups.xorte.com/MUTHA-FUCKER-Derrik-Halden-Zimmermann-is-a-WORKPLACE-BULLY%2Ct%2C88985%2C8.html
- 31. http://www.hilpers.fr/1328035-leica-punk-halden-a-zimmermann
- 32. http://www.mombu.com/fishing/t-jerk-off-artist-halden-zimmermann-17895484.html
- 33. http://www.recgroups.com/t/1/219074
- 34. http://www.werx.nl/rotton-bastard-derrik-halden-zimmermann-is-t375236
- 35. http://www.znaczacy.com/leica-asshole-halden-a-zimmermann-yes-t864497
- 36. www.grupy.banzaj.pl > pl.rec.dom
- 37. leica.asshole.hal.zimmerman.mediafetcher.com/news/top stories/
- 38. http://www.dcowboys.xyz/2014/Feb/20/408178.html
- 39. www.forumszone.com/topic.aspx?topic_id=2069531
- 40. http://anti-matrix.org/Convert/Articles_Politics/Politics/Politics-Selected-Articles_140227181616.html
- 41. http://news.answers.squte.com/usenet/rotton-bastard-derrik-halden-zimmermann-violent-bully?destination=node%2F5276%3Fsrc%3Dtwttr
- 42. http://bbs.math.ncu.edu.tw/bmore?tv&4882
- 43. http://www.grupy.banzaj.pl/ASSHOLE,Derrik,Halden,Zimmermann,is,a,DRUNK EN,PUNK,17,1126586,2 014 03.html
- 44. http://www.grupy.banzaj.pl/http,www,ripoffreport,com,features,FUCKING,HOT HEAD,Halden,Zimmerm ann,24,745950,2014 03.html
- 45. http://tinyurl.com/haldenzimmermann
- 46. http://tinyurl.com/haldenazimmermann
- 47. http://tinyurl.com/derrikzimmermann
- 48. http://tinyurl.com/derrikezimmermann
- 49. sci.skeptic.narkive.com/FSGYKmyD/danaher-punk-hal-zimmermann-is-a-fucking-bully
- 50. danaher.asshole.hal.zimmermann.ishomosexual.com/default.asp?type=mean
- 51. http://www.gogame.pw/2013/Dec/11/160992.html
- 52. http://www.mombu.com/fishing/fishing/t-jerk-off-artist-halden-zimmermann-17895484.html
- 53. www.addeffects.net/mouse-rotate.asp?...danaher.asshole...shots%2F%3Fvn%3DDanaher...
- 54. https://groups.google.com/d/topic/alt.english.usage/YgXnFn0aSII
- 55. danaher.asshole.halden.is.hot.mediafetcher.com.addeffects.net/
- 56. www.forumszone.com/topic.aspx?topic_id=2068560
- 57. italia.forumszone.com/topic.aspx?topic id=2069924
- 58. danaher.asshole.hal.zimmerman.mediafetcher.com/news/top stories/
- 59. www.grupy.banzaj.pl > pl.soc.prawo
- 60. www.mombu.com/fishing/.../t-jerk-off-artist-halden-zimmermann-17895484.html
- 61. www.gdead.pw/2014/Jan/10/425161.html
- 62. www.werx.nl/violent-punk-halden-a-zimmermann-fired-t375775
- 63. http://www.theusenetarchive.com/usenet-message-halden-zimmermann-is-a-leica-masturbator- 40391250.htm
- 64. https://soniaheart.wordpress.com/2013/09/23/halden-zimmerman-is-a-punk/
- 65. https://soniaheart.wordpress.com/tag/violent-fucking-hot-head/

- 66. www.gogame.pw/2013/Aug/20/160951.html
- 67. forum.menstream.pl > Forum > Męski świat > Spor
- 68. https://www.nzbx.ws/article.php?group=no.general&article=41&action=info
- 69. www.hilpers.fr > rec.* > rec.cuisine
- 70. www.ezz.dk > fritid.* > fritid.bil
- 71. labware.sci-chem.info/2012/Feb/24/98fc8f88db8414d9a1613b379c4b62da.html
- 72. doxbox.squte.com/n/5315
- 73. newsgroups.derkeiler.com > Archive > Soc > soc.genealogy.medieval > 2014-02
- 74. labware.sci-chem.info/archive-1.html
- 75. www.funnyjunk.com/search/profile/all/thumbs/desc/30/25
- 76. http://www.funnyjunk.com/search/profile/all/thumbs/desc/30/25?q=profile&from =www.WHAK.com
- 77. pl.rec.ogrody.narkive.com/7F8Oml6y/hal-zimmermann-was-a-fucking-leica-bully
- 78. www.grupy.banzaj.pl > pl.rec.motocykle
- 79. http://leica-asshole-halden-a-zimmermann.is-patriotic.com/country/muslim-terrorist-countries/
- 80. http://leica.asshole.hal.a.zimmermann.wasarrested.com.addeffects.net/new/is-gay/?vn=Leica+Asshole&vc=WHAK.com+Gayzine&vg=Transgender
- 81. http://hal.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 82. http://asshole.hal.zimmermann.mediafetcher.com/news/top stories/worldrec ord
- 83. http://derrik.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 84. http://asshole.derrik.zimmermann.mediafetcher.com/news/top_stories/world record
- 85. http://leica.asshole.hal.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 86. http://leica.asshole.derrik.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 87. http://leica.asshole.hal.a.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 88. http://leica.asshole.derrik.a.zimmermann.mediafetcher.com/news/top_stories/worl drecord
- 89. http://danaher.asshole.hal.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 90. http://danaher.asshole.derrik.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- 91. http://danaher.asshole.hal.a.zimmermann.mediafetcher.com/news/top_stories/worl drecord
- 92. http://danaher.asshole.derrik.a.zimmermann.mediafetcher.com/news/top_stories/worldrecord
- U. The following assertions made by Defendant in the Posts are false and defamatory, and include but are not limited to that Plaintiff:
 - 1. is addicted to crack cocaine
 - 2. was arrested for crack cocaine possession

- 3. is addicted to drugs
- 4. was charged with violent crimes
- 5. loves bestiality
- 6. is a cocksucking kiddy diddler
- 7. is a pedophile
- 8. is a criminal
- 9. was arrested
- 10. attempted to hack into hundreds and maybe thousands of pornographic websites
- 11. is a computer hacker
- 12. is being held in custody and facing charges of 14 counts of public indecency for defecating in public
- 13. was arrested on federal criminal charges
- 14. was accused of credit card fraud
- 15. got into a bar brawl at a work event after drinking all evening long
- 16. was fired from a past place of employment because of a bar brawl
- 17. has a library of pornographic films
- 18. is a piece of shit
- 19. is A fucking violent punk
- 20. is a pervert
- 21. is an asshole
- 22. is a hacker
- 23. is a World Champion Masturbator
- 24. is a jerk
- 25. is addicted to drugs
- 26. is a homosexual

V. Defendant's assertions of fact about Plaintiff are false because, among other reasons plaintiff:

- 1. Is not addicted to crack cocaine or any drugs
- 2. Plaintiff was not arrested for crack cocaine or any drug crimes
- 3. Plaintiff has never been charged with any violent crimes
- 4. Plaintiff does not love bestiality and has never engaged in bestiality
- 5. Plaintiff is not a cocksucking kiddy diddler
- 6. Plaintiff is not a pedophile
- 7. Plaintiff is not a criminal
- 8. Plaintiff was not arrested
- 9. Plaintiff did not attempt to or hack into any websites
- 10. Plaintiff is not a computer hacker
- 11. Plaintiff was not accused of credit card fraud
- 12. Plaintiff never got into a bar brawl
- 13. Plaintiff never got into a fight at a bar
- 14. Plaintiff never was fired
- 15. Plaintiff does not have a library of pornographic films or any pornographic films
- 16. Plaintiff is not a homosexual

- 17. Plaintiff is not a piece of shit
- 18. Plaintiff is not a hacker
- 19. Plaintiff is not a world champion masturbator
- 20. Plaintiff is not a jerk
- 21. Plaintiff is not addicted to drugs
- 22. Plaintiff has never committed any crimes, and in fact has a clean criminal background
- W. Defendant's defamation in all Posts referenced in Exhibit A and included herein constitute libel per se, and libel per quod
- X. Defendant's defamation directly and proximately caused Plaintiff injury and will continue to cause Plaintiff irreparable injuries.

II. Defendant's Posts have caused Plaintiff Intentional Infliction of Emotional Distress

- A. Plaintiff has proved that the Defendants actions in posting the hundreds of false, defamatory, Posts online, and in posting the private posts online to torment Plaintiff constitute the Intentional Infliction of Emotional Distress ("IIED").
- B. Plaintiff has proved all elements of a claim for IIED which are as follows: (1) the Defendant either intended to cause emotional distress, or knew or should have known that its actions would results in serious emotional distress; (2) the Defendant's conduct was so extreme and outrageous as to go beyond all possible bounds of decency, and would be considered intolerable in a civilized community; (3) Defendant's actions proximately caused injury to Plaintiff; and (4) the mental anguish Plaintiff suffered is serious and of such a nature that no reasonable person could be expected to endure.

III. Defendant's Posts Constitute Tort Of Intrusion Upon Seclusion

A. Plaintiff has proved that Defendant's actions in posting the hundreds of false and defamatory Posts, and posting private posts constitute the tort of intrusion upon seclusion.

- B. Plaintiff has proved there was: (1) a wrongful intrusion; (2) into Plaintiff's private activities; (3) in a manner that has outraged caused mental suffering, shame, and humiliation to a person of ordinary sensibilities.
- C. Additionally, Defendant's actions have caused mental suffering, shame, and humiliation to Plaintiff who is of ordinary sensibilities

IV. Defendant's Posts Constitute Tort Of Publication Of Private Facts

- A. Plaintiff has proved that Defendant's actions in posting the hundreds of Posts, constitute the tort of publication of private facts.
- B. Plaintiff has proved that the Posts by Defendant (1) have and had publicity; (2) the facts disclosed do concern the private life of the Plaintiff; (3) the matters publicized were highly offensive and objectionable to a reasonable person of ordinary sensibilities; (4) the publications/posts were made intentionally; and (5) the matters publicized are not a legitimate concern to the public.

DAMAGES, FEES, AND COSTS

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that no damages are awarded to any party in this matter.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all costs of Court expended or incurred in this cause are taxed against the party incurring same.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Court retains jurisdiction to enforce this Judgment.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Order is the Final Judgment of this Court, and all relief prayed for by any party but not herein expressly granted be and is hereby denied.

0D631	-	Franklin County Ohio Clerk of Courts of the Common Pleas- 2017 Jun 13 1:52 PM-16CV006184 R47
		SIGNED this day of, 2017.
		JUDGE COLLEEN O'DONNELL

Franklin County Court of Common Pleas

Date: 06-13-2017

Case Title: HALDEN ZIMMERMANN -VS- JOHN DOE

Case Number: 16CV006184

Type: SUMMARY JUDGMENT FOR PLAINTIFF

It Is So Ordered.

/s/ Judge Colleen O'Donnell

Electronically signed on 2017-Jun-13 page 38 of 38

Court Disposition

Case Number: 16CV006184

Case Style: HALDEN ZIMMERMANN -VS- JOHN DOE

Case Terminated: 18 - Other Terminations

Final Appealable Order: Yes

Motion Tie Off Information:

Motion CMS Document Id: 16CV0061842017-02-2499980000
 Document Title: 02-24-2017-MOTION FOR SUMMARY

JUDGMENT - PLAINTIFF: HALDEN ZIMMERMANN

Disposition: MOTION GRANTED