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KING COUNTY SUPERIOR COURT CLERK E-FILED

CASE NUMBER: 13-2-37021-2 SEA

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DECLARATION OF BONNIE NORMAN - 1

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### DECLARATION OF BONNIE NORMAN

Cause No. 13-2-37021-2 SEA

I, Bonnie Norman, testify and declare as follows:

INTEL-GE CARE INNOVATIONS LLC; a

Delaware limited liability company; BONNIE

NORMAN, a California resident; and STEVE

BACKERS, a California resident,

v.

resident,

Plaintiffs,

JAMES H. MORRISON, a Washington

Defendant.

 I am the Petitioner in the above-entitled action, over eighteen years of age, competent to testify to the matters set forth in this declaration, and make this declaration from personal knowledge of those matters.

SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

- I work for Care Innovations as Director of Quality and Regulatory Affairs.
   Care Innovations offers products and services designed to help the sick and the elderly better manage their day-to-day care.
- 3. I also volunteer as a forum moderator on the Tesla Motors Club website located at <www.teslamotorsclub.com> (the "TMC Website"). The TMC Website provides an online forum for Tesla car owners and enthusiasts to exchange ideas, news

and information. The TMC Website is completely unrelated to Care Innovations.

- 4. Occasionally, the TMC Website operators decide to ban users who engage in inappropriate behavior. I am not an owner or operator of the TMC Website. As a moderator, I do not have any authority to ban anyone nor do I have any authority to reverse a ban.
- 5. On October 27, 2013 the Respondent, James Morrison, contacted me by sending me a private message on the Facebook social networking website. In the message, Mr. Morrison accused me of frivolously banning his TMC Website account and told me he would be "escalating the issue" and that "the escalation will be towards your professional career at Care Innovations." He said I had "a limited amount of time (days) to correct your mistake" otherwise he would retaliate "in a manner that will have an impact on your personal and professional reputation." A true and correct copy of Mr. Morrison's messages to me and my responses is attached as Exhibit A to this declaration.
- 6. I responded to Mr. Morrison via Facebook and told him that I did not have any authority to ban accounts. I told him I would be passing along the message to a lawyer. (See Ex. A.)
- 7. Mr. Morrison responded via Facebook informing me the promised "escalation" would occur "without further notice". (*See* Ex. A.)
- 8. I responded to Mr. Morrison via Facebook and asked him why he believed I had attacked him and why he believed I had the power to ban people from the TMC Website. (See Ex. A.)
- 9. Mr. Morrison responded via Facebook telling me to "drop the stupid act" and repeating his threat. (*See* Ex. A.)
- 10. I responded to Mr. Morrison via Facebook, asking him to apologize and telling him I did not like being threatened. (*See* Ex. A.)
- 11. Mr. Morrison responded via Facebook that: "There will be no more responses. Escalation is happening. Goodbye." (*See* Ex. A.)
  - 12. At that point I learned from the TMC Website owners that Mr. Morrison

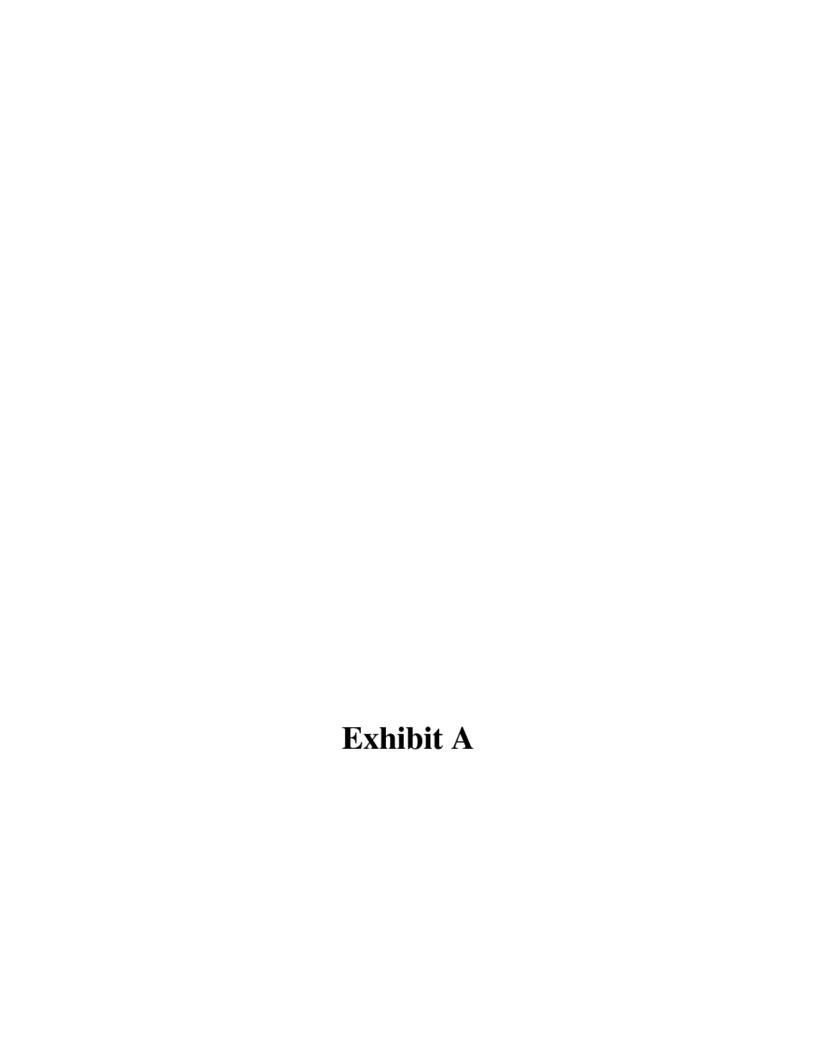
1	Steve Backers
2	3310 Bellingham Pl
3	El Dorado Hills, CA 95762
4	
5	This has been reported to the authorities.
6	
7	In the meantime, please take reasonable precautions if you have
8	small children living with you or visiting your home.
9	
10	Thank you,
11	Bonne Durand Norman
12	Director Care Innovations
13	A true and correct copy of a screen capture of the website is attached as Exhibit B
14	to this declaration.
15	19. My maiden name is Durand and I go by "Bonnie Durand Norman" on
16	Facebook to make it easier for old friends to find me. But I did not create the website or
17	any of its content.
18	20. None of the allegations published on the Harassing Website are true and I
19	have never made any of these allegations against Mr. Backers.
20	21. I accessed the publicly available domain registration records associated
21	with the Harassing Website by visiting the website located at <who.godaddy.com>.</who.godaddy.com>
22	These records contain the WHOIS registration information associated with the domain
23	name. These records show that the domain name for the Harassing Website was
24	registered on October 28, the day after Mr. Morrison threatened me with "escalation" and
25	"retaliation" and shortly before he sent me the message with the link to the Harassing
26	Website. A true and correct copy of these records is attached as Exhibit C to this
27	declaration.
28	22. Via the website located at <who.godaddy.com> I also accessed the publicly</who.godaddy.com>

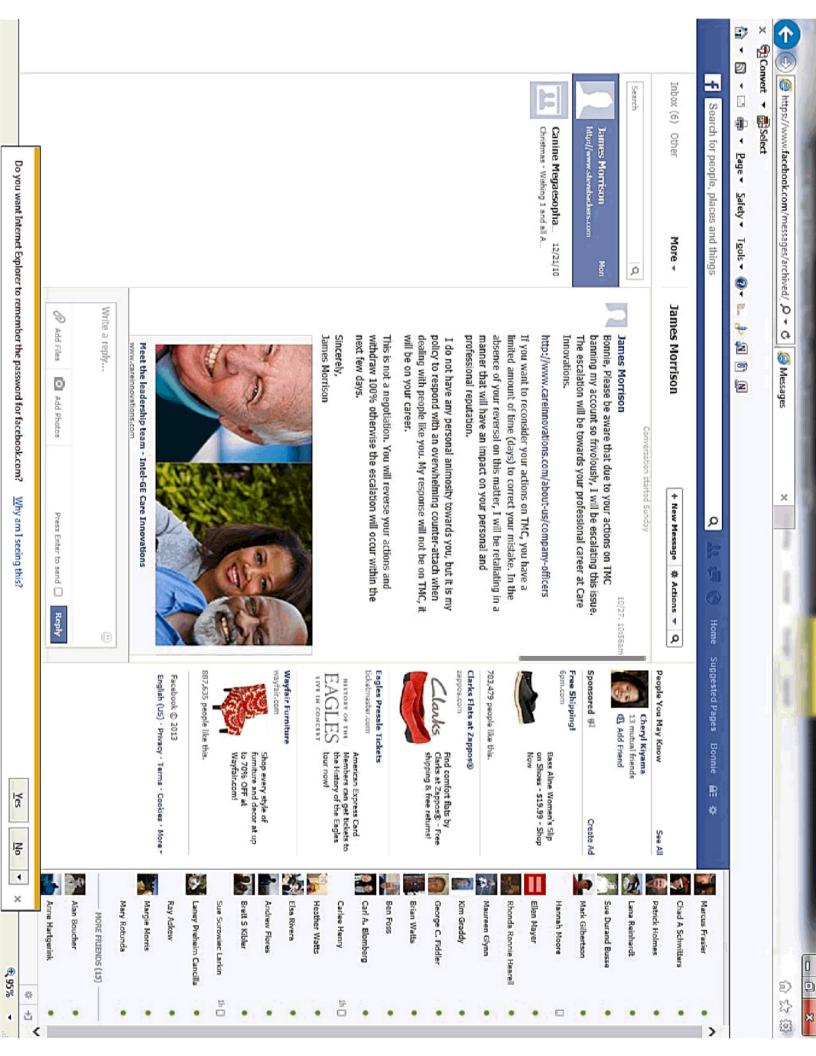
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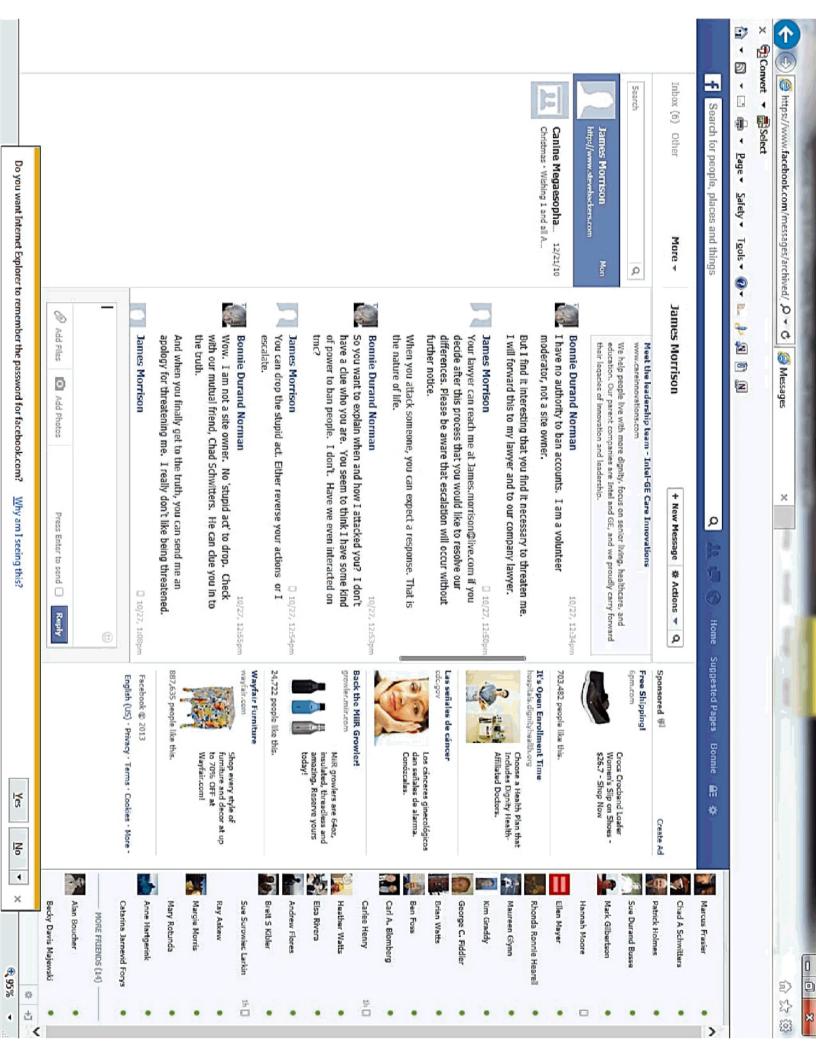
- 27. I live alone in a rural area. A few of my neighbors found out about this and they distributed photos of Mr. Morrison to everyone in our area so that people could keep an eye out for him in case he decides to escalate things even further. My neighbors also check my home to confirm it is safe before I enter. I've already consulted with several friends in law enforcement about my personal safety. On their advice I have literally been sleeping with a loaded gun—before this incident it almost never left my gun safe. The last three nights I have slept with all of the outside flood lights on. Each night I wake up about a dozen times.
- 28. Emotionally, I feel very upset. I feel victimized and I hate being a victim. I hate what this has done to me. It is embarrassing for me personally and professionally. At work, I feel embarrassed that I am somehow causing a disruption. And I feel wretched that Mr. Morrison has targeted my friends and coworkers reputations in order to harass me. Every time my phone pings I get a sick feeling wondering if it's him contacting me again with another website defaming someone I care about. I feel terrorized and I want it to stop.
- 29. I want Mr. Morrison to stop harassing me—directly or via attacks on my friends and coworkers. Unless Mr. Morrison is restrained from continuing his harassing conduct, I will continue to suffer irreparable harm.

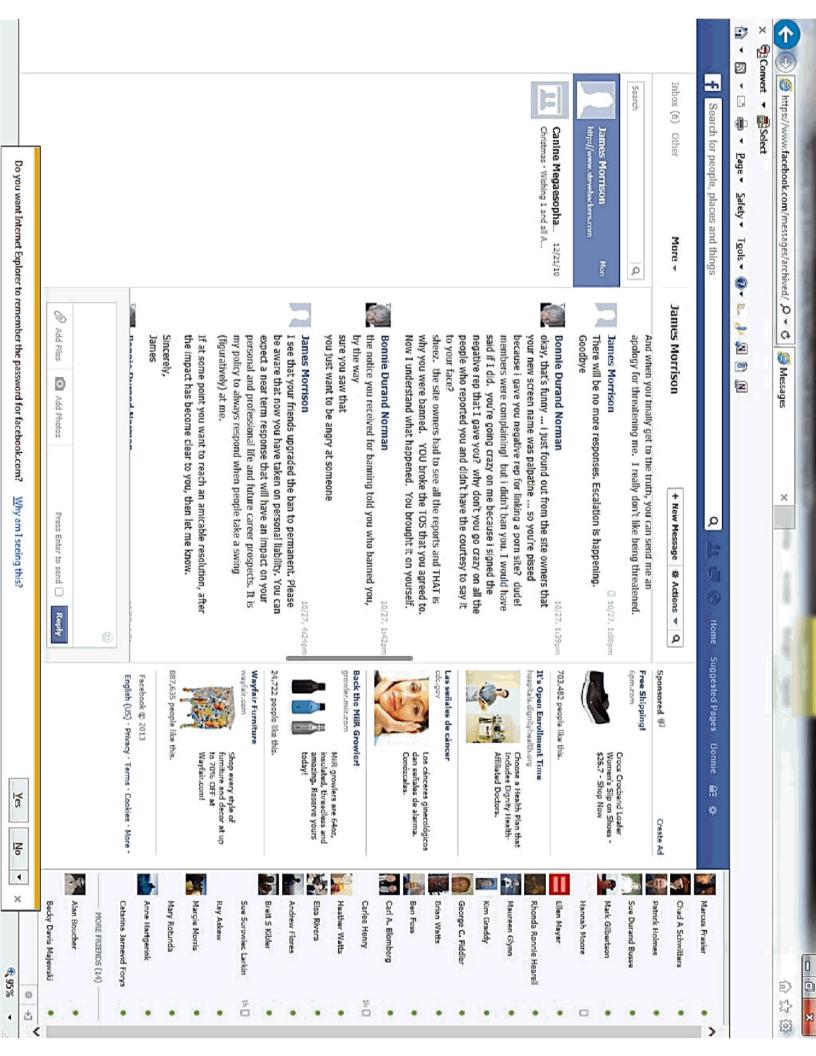
I certify and declare under the penalty of perjury under the law of the State of Washington that to my knowledge the foregoing is true and correct.

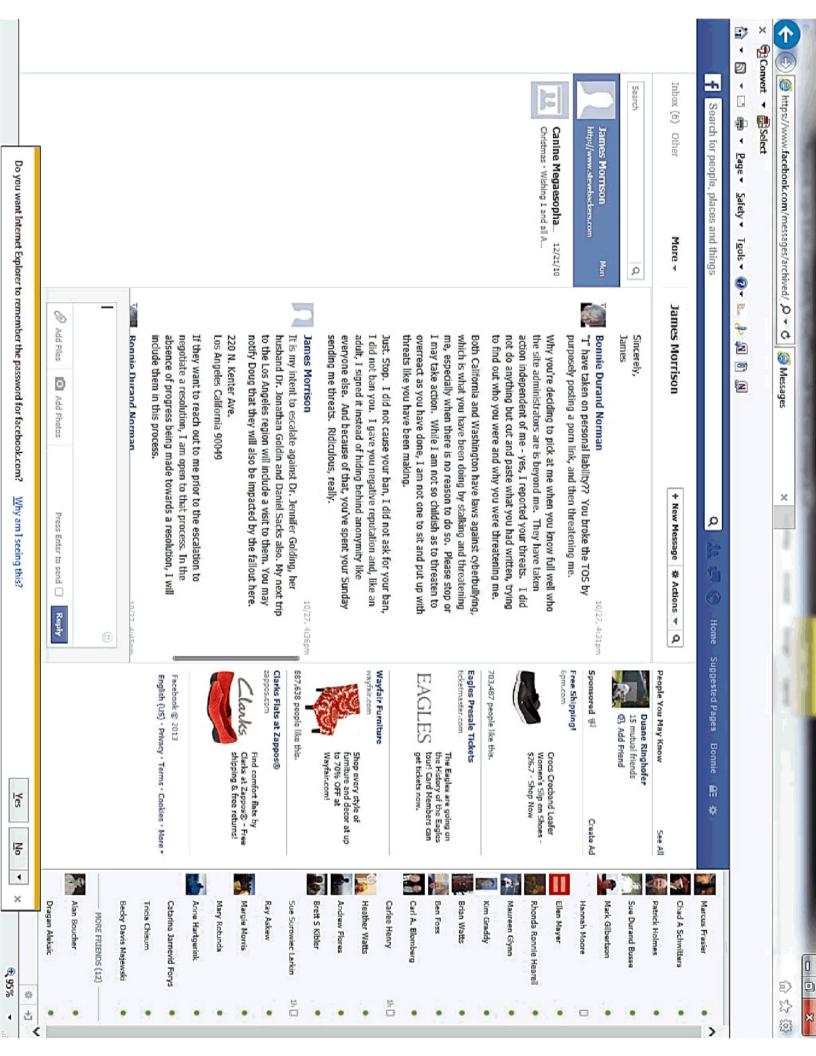
Executed this 30<sup>th</sup> day of October, 2013 in Roseville, California.

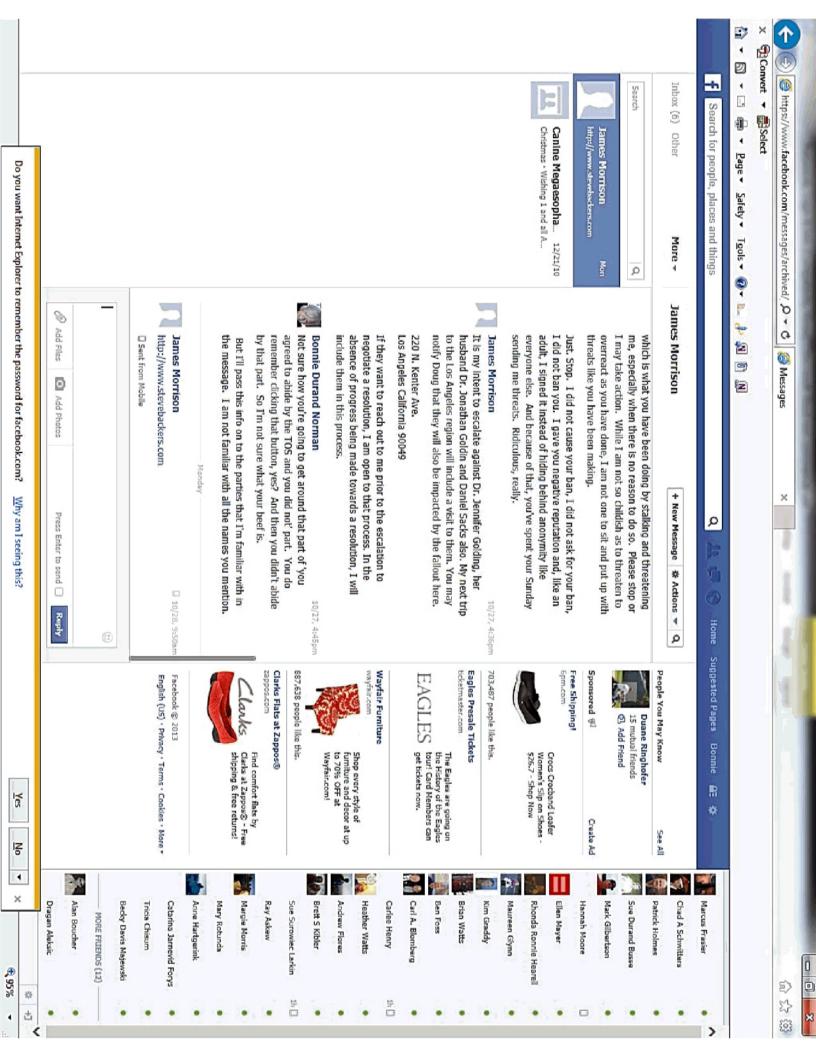


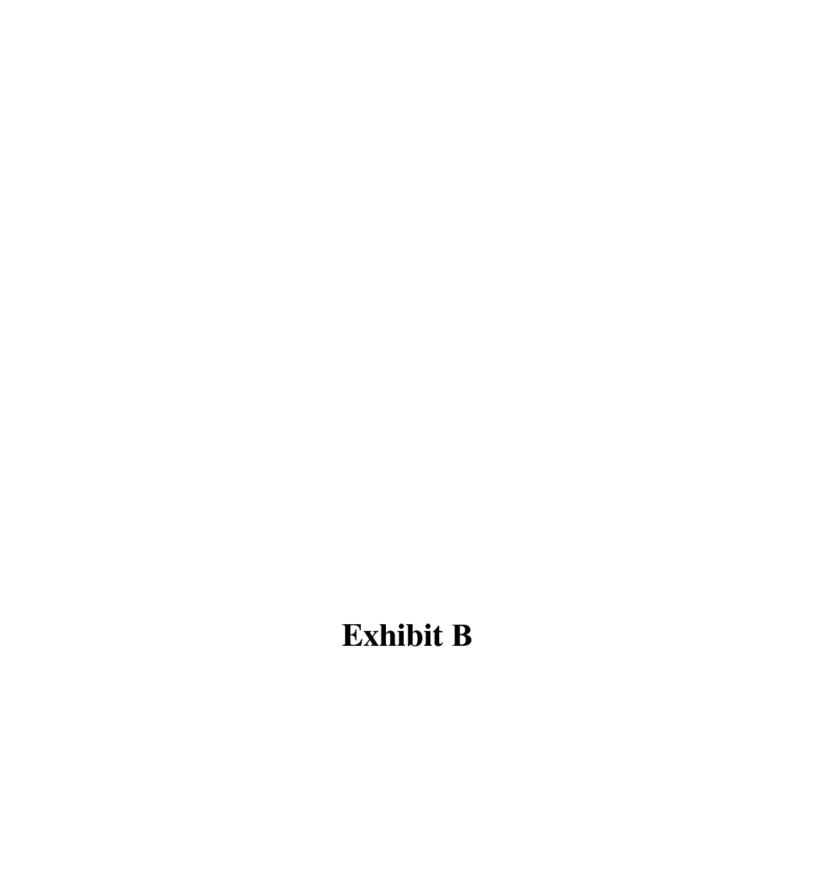














During an unrelated investigation, a large number of images depicting graphic child pornography were found on the computer of Steve Backers. predator living nearby. Please be aware that we have a dangerous child

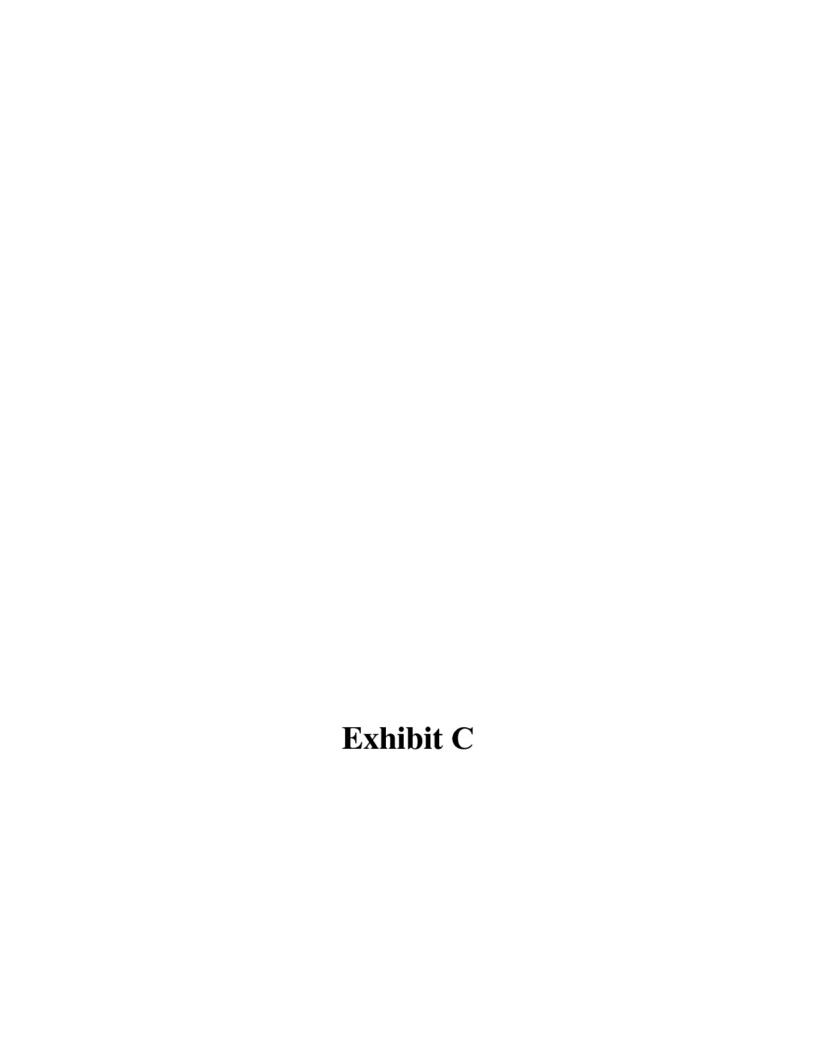
Steve Backers 3310 Bellingham Pl El Dorado Hills, CA 95762

This has been reported to the authorities.

In the meantime, please take reasonable precautions if you have small children living with you or visiting your home.

Thank you, Bonne Durand Norman Director Care Innovations







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Convert -



It's go time

Find a domain

**2** 

69

Create an account or

Log In

24/7 Support (480) 505-8877 Hablamos Español

Cart 0

STEVEBACKERS.COM WHOIS search results for: (Registered) Products v Domain Names Websites Hosting Web Tools Add hosting, small and more Is this your domain? Support Get it with our Domain Buy service Want to buy this domain? My Account

Updated Date: 2013-10-28 11:17:16 Registrar URL: http://www.godaddy.com Domain Name: STEVEBACKERS.COM

Registrar: GoDaddy.com, LLC Registrar Expiration Date: 2014-10-28 11:17:16

Creation Date: 2013-10-28 11:17:16

Domain Status: clientRenewProhibited Domain Status: clientDeleteProhibited

Domain Status: clientUpdateProhibited Domain Status: clientTransferProhibited

Registrant Organization: Domains By Proxy, LLC Registrant Name: Registration Private

Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309 Registrant Street: DomainsByProxy.com

Registrant City: Scottsdale

Registrant State/Province: Arizona

Registrant Country: United States Registrant Postal Code: 85260

Admin Organization: Domains By Proxy, LLC Admin Name: Registration Private

Admin Street: DomainsByProxy.com

Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309

Admin City: Scottsdale

Admin Postal Code: 85260 Admin State/Province: Arizona

Admin Country: United States

Admin Phone: (480) 624-2599

Admin Fax: (480) 624-2598

Admin Email: STEVEBACKERS.COM@domainsbyproxy.com

Tech Organization: Domains By Proxy, LLC Tech Name: Registration Private

Tech Street: DomainsByProxy.com

Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309

Tech City: Scottsdale

Tech State/Province: Arizona

Tech Postal Code: 85260

Tech Country: United States

Tech Phone: (480) 624-2599

Tech Fax: (480) 624-2598

Name Server: NS33.DOMAINCONTROLCOM Tech Email: STEVEBACKERS.COM@domainsbyproxy.com

Name Server: NS34,DOMAINCONTROLCOM The data contained in GoDaddy.com, LLC's WHOIS database,

with no guarantee or warranties regarding its accuracy. This while believed by the company to be reliable, is provided "as is"

## Domain already taken?

Enter Domain Name .com ◂ Search



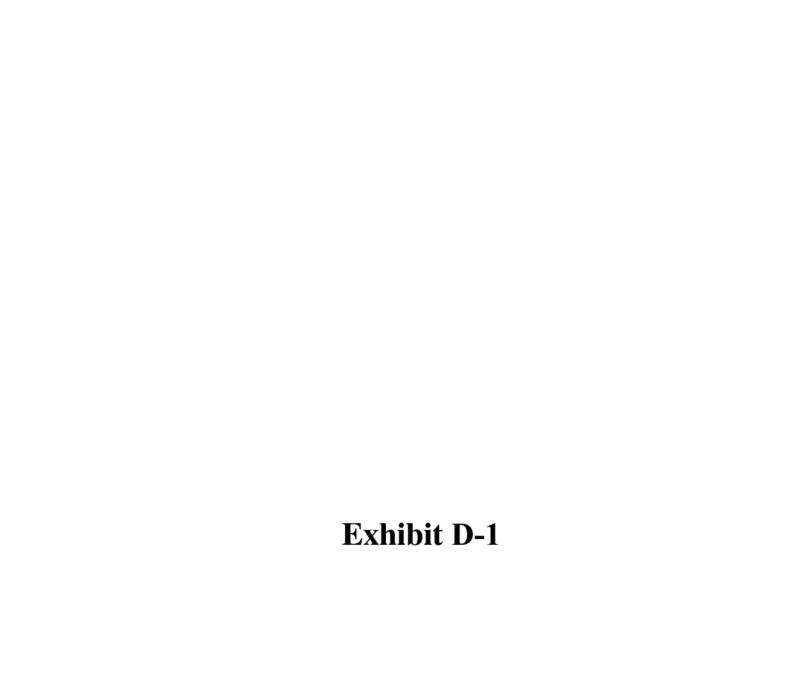
### NameMatch Recommendations

capture more Web traffic, which you can then direct to your primary domain. Registering multiple domain names may help protect your online brand and enable you to GoDaddy.com NameMatch has found similar domain names related to your search.

### Domains available for new registration:

								<
stevebackers.me	stevebackers.biz	stevebackers.ca	stevebackers.us	stevebackers.info	stevebackers.org	stevebackers.net	stevebackers.co	Alternate TLDs
SAVE	SAVE		SAVE	SAVE	SAVE	SAVE	SAVE	
\$9.99/yr	\$6.99*/yr	\$12.99/yr	\$3.99/yr	\$2.99*/yr	\$9.99*/yr	\$9.99*/\r	\$12.99/yr	

dackers.com	doshackers.com Ends on: 1/2/2014 11:39:00 AM PDT	iumpmansneackers.com Ends on: 1/12/2014 10:12:00 AM PDT	☐ <u>lackers.com</u> Ends on: 1/18/2014 7:24:00 PM PDT	☐ <u>03ckers.com</u> Ends on: 1/20/2014 9:04:00 AM PDT	
\$50,00°	\$928.00*	\$299.00*	\$5,000.00*	\$799.00*	





£63



Find a domain

69

Create an account or

Log In

24/7 Support: (480) 505-8877 My Account Hablamos Español Cart 0

Domain Name: ERICDISHMAN.COM

WHOIS search results for:

Products v Domain Names

Websites

Hosting

Web Tools

Support

ERICDISHMAN.COM

(Registered)

Creation Date: 2013-10-28 11:17:16 Updated Date: 2013-10-28 11:17:16 Registrar URL: http://www.godaddy.com

Registrar: GoDaddy.com, LLC Registrar Expiration Date: 2014-10-28 11:17:16

Domain Status: clientRenewProhibited Domain Status: clientDeleteProhibited

Domain Status: clientUpdateProhibited Domain Status: clientTransferProhibited

Registrant Organization: Domains By Proxy, LLC Registrant Name: Registration Private

Registrant Street: DomainsByProxy.com

Registrant City: Scottsdale Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309

Registrant State/Province: Arizona

Registrant Country: United States Registrant Postal Code: 85260

Admin Name: Registration Private

Admin Street: DomainsByProxy.com Admin Organization: Domains By Proxy, LLC

Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309

Admin City: Scottsdale

Admin State/Province: Arizona

Admin Country: United States Admin Postal Code: 85260

Admin Phone: (480) 624-2599

Admin Fax: (480) 624-2598

Admin Email: ERICDISHMAN.COM@domainsbyproxy.com

Tech Organization: Domains By Proxy, LLC Tech Name: Registration Private

Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309 Tech City: Scottsdale

Tech Street: DomainsByProxy.com

Tech State/Province: Arizona

Tech Postal Code: 85260

Tech Country: United States

Tech Phone: (480) 624-2599

Tech Fax: (480) 624-2598

Name Server: NS33,DOMAINCONTROLCOM Tech Email: ERICDISHMAN.COM@domainsbyproxy.com

Name Server: NS34,DOMAINCONTROLCOM

with no guarantee or warranties regarding its accuracy. This while believed by the company to be reliable, is provided "as is" The data contained in GoDaddy.com, LLC's WHOIS database,

## Domain already taken?

Add hosting, small and more

Get it with our Domain Buy service

Want to buy this domain?

Is this your domain?

Enter Domain Name com 4

Search

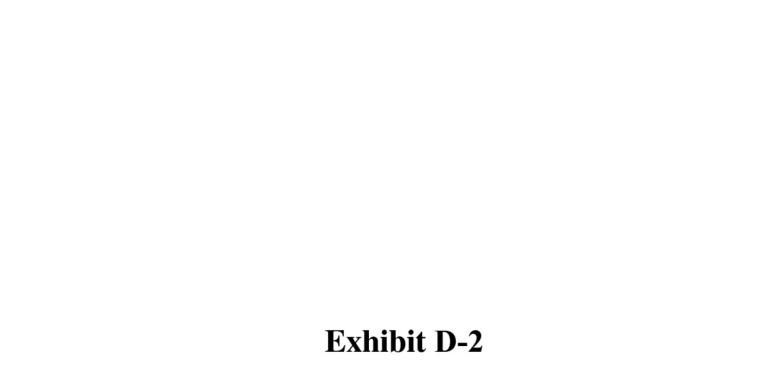
### NameMatch Recommendations

capture more Web traffic, which you can then direct to your primary domain. Registering multiple domain names may help protect your online brand and enable you to GoDaddy.com NameMatch has found similar domain names related to your search.

### Domains available for new registration:

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	EricLutz.com	EricGay.com	EricMacdonald.com	Similar Premium Domains	ericdishman.cc —	eriodishman.asia	ericdishman.ws	ericdishman.tv	ericdishman.ca	ericdishman.co	Alternate TLDs
ADD TO CART											
							SAVE			SAVE	
	\$349,00*	\$349.00*	\$349.00*		\$19.99/yr	\$19.99*/yr	\$9.99/yr	\$39.99/yr	\$12.99/yr	\$12.99/yr	

eriodigest.com Ends on: 1/18/2014 9:04:00 AM PDT	andishmandan.com Ends on: 1/21/2014 6:40:00 PM PDT	andishmand-co.com Ends on: 1/23/2014 11-55:00 AM PDT	<u>pishman.com</u> Ends on: 1/27/2014 6:39:00 PM PDT
\$4,995.00*	\$2,895.00*	\$60,00*	\$60.00*







Products v Domain Names

Websites

Hosting

Web Tools

Support

Find a domain

60

Create an account or

Log In

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24/7 Support (480) 505-8877

Hablamos Español

My Account Cart 0

WHOIS search results for: AMESPURSLEY.COM Add hosting, email and mon domain? Is this your Get it with our Domain Buy service Want to buy this domain?

(Registered)

Registrant City: Scottsdale Registrant Street: DomainsByProxy.com Domain Status: clientUpdateProhibited Domain Status: clientTransferProhibited Domain Status: clientRenewProhibited Domain Status: clientDeleteProhibited Registrar: GoDaddy.com, LLC Registrar Expiration Date: 2014-10-28 11:17:16 Creation Date: 2013-10-28 11:17:16 Updated Date: 2013-10-28 11:17:16 Registrar URL: http://www.godaddy.com Domain Name: JAMESPURSLEY.COM Registrant State/Province: Arizona Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309 Registrant Organization: Domains By Proxy, LLC Registrant Name: Registration Private

Admin Street: DomainsByProxy.com Admin Organization: Domains By Proxy, LLC Admin Name: Registration Private Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309 Registrant Country: United States Registrant Postal Code: 85260

Admin Fax: (480) 624-2598 Admin Country: United States Admin Postal Code: 85260 Admin Phone: (480) 624-2599

Admin State/Province: Arizona

Admin City: Scottsdale

Tech Street: DomainsByProxy.com Tech Organization: Domains By Proxy, LLC Tech Name: Registration Private Admin Email: JAMESPURSLEY.COM@domainsbyproxy.com

Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309 Tech State/Province: Arizona Tech City: Scottsdale

Tech Country: United States Tech Postal Code: 85260

Tech Phone: (480) 624-2599 Tech Fax: (480) 624-2598

Tech Email: JAMESPURSLEY.COM@domainsbyproxy.com

Name Server: NS34,DOMAINCONTROLCOM Name Server: NS33.DOMAINCONTROLCOM

with no guarantee or warranties regarding its accuracy. This while believed by the company to be reliable, is provided "as is" The data contained in GoDaddy.com, LLC's WHOIS database,

# Domain already taken?

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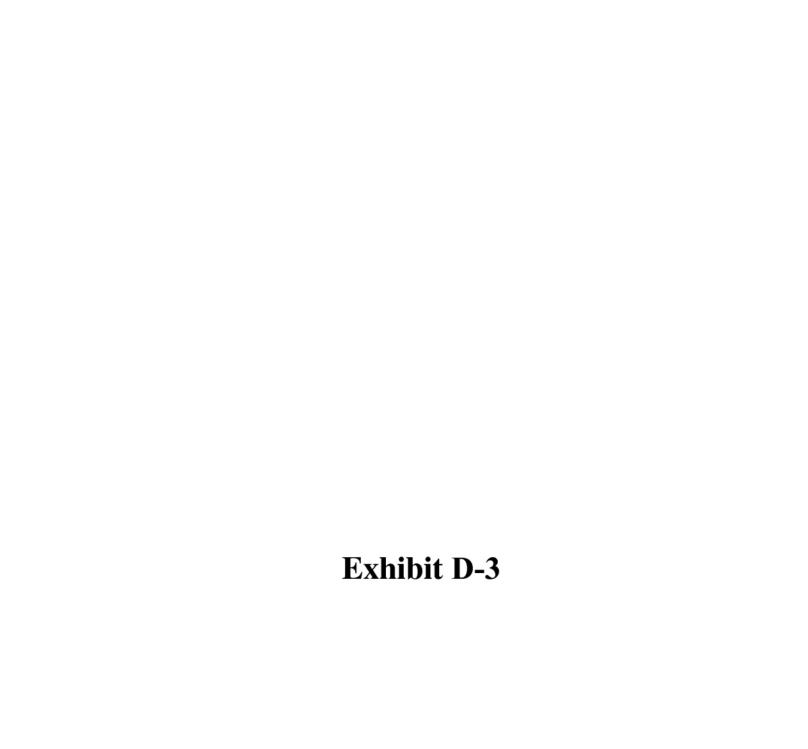
### NameMatch Recommendations

capture more Web traffic, which you can then direct to your primary domain. Registering multiple domain names may help protect your online brand and enable you to GoDaddy.com NameMatch has found similar domain names related to your search.

### Domains available for new registration:

							<							<
ADD TO CART	DoctorJames.com	Sucklames.com	AllamesHypnotist.com	JamesDuval.com	JamesAgee.com	Jameshory.com	Similar Premium Domains	jamespursley.cc	jamespursley.asia	jamespursley.ws	jamespursley.tv	[amespursley.ca	jamespursley.co	Alternate TLDs
CART										SAVE			SAVE	
	\$4,388.00*	\$1,747,00*	\$1,988.00*	\$349.00*	\$349.00*	\$349.00*		\$19.99/уг	\$19.99*/yr	\$9.99/yr	\$39.99/yr	\$12,99/yr	\$12.99/yr	

lebroniamesnike.com Ends on: 1/24/2014 1	Ends on: 1/24/2014 1
12:00:00 AM POT	12:02:00 PM PDT
\$501.00*	\$148.00*







Find a domain

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Create an account or

24/7 Support (480) 505-8877 Log In

Hablamos Español

WHOIS search results for: Products V Domain Names MARCUSGRINDSTAFF.COM Websites Hosting Web Tools Add hosting, email and mon Is this your domain? Support Get it with our Domain Buy service Want to buy this domain? My Account Cart 0

(Registered)

Registrant City: Scottsdale Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309 Registrant Street: DomainsByProxy.com Domain Status: clientUpdateProhibited Domain Status: client TransferProhibited Domain Status: clientRenewProhibited Domain Status: clientDeleteProhibited Registrar: GoDaddy.com, LLC Registrar Expiration Date: 2014-10-28 11:17:16 Creation Date: 2013-10-28 11:17:16 Updated Date: 2013-10-28 11:17:16 Registrar URL: http://www.godaddy.com Domain Name: MARCUSGRINDSTAFF.COM Registrant State/Province: Arizona Registrant Organization: Domains By Proxy, LLC Registrant Name: Registration Private

Registrant Country: United States Registrant Postal Code: 85260

Admin Street: DomainsByProxy.com Admin Organization: Domains By Proxy, LLC Admin Name: Registration Private

Admin City: Scottsdale Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309

Admin Postal Code: 85260 Admin State/Province: Arizona

Admin Country: United States

Admin Phone: (480) 624-2599

Admin Fax: (480) 624-2598

Tech Organization: Domains By Proxy, LLC Tech Name: Registration Private Admin Email: MARCUSGRINDSTAFF.COM@domainsbyproxy.com

Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309

Tech Street: DomainsByProxy.com

Tech City: Scottsdale

Tech State/Province: Arizona

Tech Postal Code: 85260

Tech Country: United States

Tech Phone: (480) 624-2599

Tech Email: MARCUSGRINDSTAFF.COM@domainsbyproxy.com Tech Fax: (480) 624-2598

Name Server: NS34,DOMAINCONTROLCOM Name Server: NS33.DOMAINCONTROLCOM

with no guarantee or warranties regarding its accuracy. This while believed by the company to be reliable, is provided "as is" The data contained in GoDaddy.com, LLC's WHOIS database

Ends on: 1/10/2014 5:01:00 PM PDT

\$500.00\*

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### NameMatch Recommendations

capture more Web traffic, which you can then direct to your primary domain. Registering multiple domain names may help protect your online brand and enable you to GoDaddy.com NameMatch has found similar domain names related to your search.

### Domains available for new registration:

			<							<
MarcusCurtis.com	MarousHemandez.com	MarcusHarvey.com	Similar Premium Domains 😌	marcusgrindstaff.cc	marcusgrindstaff.asia	marcusgrindstaff.ws	marcusgrindstaff.tv	marcusgrindstaff.ca	marcusgrindstall.co	Alternate TLDs
			g od			SAVE			SAVE	
\$349.00*	\$349.00*	\$349,00*		\$19.99/уг	\$19.99*/yr	\$9.99/yr	\$39.99/yr	\$12.99/yr	\$12.99/yr	

gavinmarcus.com	☐ marcusschulz.com	grindstaffauction.com	marcusroberson.com
	Ends on: 1/23/2014 10:02:00 AM PDT	Ends on: 1/25/2014 12:30:00 PM PDT	Ends on: 1/27/2014 11:24:00 AM PDT
	\$595.00*	\$799.00*	\$695.00*







Registrant City: Scottsdale Registrant Street: DomainsByProxy.com Domain Status: clientUpdateProhibited Domain Status: clientTransferProhibited Domain Status: clientRenewProhibited Domain Status: clientDeleteProhibited Registrar: GoDaddy.com, LLC Registrar Expiration Date: 2014-10-28 11:17:16 Creation Date: 2013-10-28 11:17:16 Updated Date: 2013-10-28 11:17:16 Registrar URL: http://www.godaddy.com Domain Name: SEANSLOVENSKLCOM Registrant State/Province: Arizona Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309 Registrant Organization: Domains By Proxy, LLC Registrant Name: Registration Private

Registrant Postal Code: 83260
Registrant Country: United States
Admin Name: Registration Private
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy,com
Admin Street: 14747 N Northsight Blwd Suite 111, PMB 309
Admin City: Scottsdale
Admin State/Province: Arizonia
Admin Country: United States
Admin Country: United States
Admin Phone: (480) 624-2598

Tech Name: Registration Private
Tech Organization: ByProxy, LLC
Tech Street DomainsByProxy.com
Tech Street 14747 N Northsight Blvd Suite 111, PMB 309
Tech City: Scottsdale
Tech State/Province: Arizona
Tech Postal Code: 85260

Admin Email: SEANSLOVENSKI.COM@domainsbyproxy.com

Tech Fax: (480) 624-2598
Tech Email: SEANSLOVENSKLCOM@domainsbyproxy.com
Name Server: NS33.DOMAINCONTROL.COM
Name Server: NS34.DOMAINCONTROL.COM

Tech Phone: (480) 624-2599

Tech Country: United States

The data contained in GoDaddy.com, LLC's WHOIS database, while helieved by the company to be reliable is provided "as is"

# Domain already taken?

ter Domain Name	
.com	
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Search	

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## NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

### Domains available for new registration:

							<
	seanslovenski.cc	seanslovenski.asia	seanslovenski.ws	seanslovenski.tv	seanslovenski.ca	seanslovenski.co	Alternate TLDs
ADD TO CART							
			SAVE			SAVE	
	\$19.99/уг	\$19.99*/yr	\$9.99/yr	\$39,99/yr	\$12.99/yr	\$12.99/yr	

### Domains available at Go Daddy Auctions®:

Ends on: 1/14/2014 11:31:00 AM PDT	<u>seansgay.com</u> Ends on: 1/16/2014 10:55:00 AM PDT	selovendo.com Ends on: 1/16/2014 6:14:00 PM PDT	<u>llovenailpro.com</u> Ends on: 1/25/2014 4:04:00 AM PDT	cosloven.com Ends on: 1/28/2014 12:04:00 PM PDT
\$60.00*	\$388.00*	\$5,000.00*	\$1,688.00*	\$2,295.00*

Yes

N

×