FILED

2013 NOV - | AM 11: 11

SUPERIOR COUNTY
SEATTLE, WA

SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR THE COUNTY OF KING

INTEL-GE CARE INNOVATIONS LLC, a Delaware limited liability company; BONNIE NORMAN, a California resident; and STEVE BACKERS, a California resident.

Plaintiff.

v.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

JAMES H. MORRISON, a Washington resident,

Defendant.

13-2-37021-28EA

[PROPOSED] TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED

THIS MATTER came before the Court on Plaintiffs' Motion for Temporary Restraining Order on the grounds that Defendant James H. Morrison's past and imminent acts will cause injury and irreparable harm to Plaintiffs Intel-GE Care Innovations LLC ("Care Innovations"), Bonnie Norman, and Steve Backers, for which Plaintiffs have no adequate remedy at law. The Court having considered the pleadings, Plaintiffs' Motion for Temporary Restraining Order, the Declaration of Bonnie Norman (and exhibits thereto), the Declaration of Steve Backers (and exhibits thereto), the October 30th Declaration of Jason Sykes (and exhibits thereto), the October 31st Declaration of Jason Sykes (and exhibits thereto), the October 31st Declaration of Jason Sykes (and exhibits thereto), the October 31st Declaration of Jason Sykes (and exhibits thereto), the October 31st Declaration of Jason

1. Morrison's behavior exhibits a course of conduct designed to harass, coerce, intimidate, and humiliate Plaintiffs by knowingly and willfully subjecting them to false allegations of engaging in and association with, the criminal acts of child pornography and pedophilia, on the website Morrison created and made available at

http://www.stevebackers.com (the "Harrassing Website").

- 2. Morrison's conduct seriously alarms, annoys, harasses and is detrimental to Plaintiffs and serves no legitimate or lawful purpose.
- 3. Morrison's conduct would cause a reasonable person to suffer substantial emotional distress and has actually caused substantial emotional distress.
- 4. Morrison has threatened to continue to escalate his conduct directed at Plaintiffs.
- 5. Plaintiffs have given Morrison notice of this hearing on his Motion for Temporary Restraining Order.

THEREFORE, the Court being fully advised of the above premises, IT IS HEREBY ORDERED that Plaintiffs' Motion for Temporary Restraining Order is GRANTED.

IT IS FURTHER ORDERED that Defendant Morrison and his agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order, are RESTRAINED AND ENJOINED from making any attempts to contact Bonnie Norman, Steve Backers, Care Innovations, or any Care Innovations employee.

IT IS FURTHER ORDERED that Defendant Morrison is RESTRAINED AND ENJOINED from making any attempts to keep Bonnie Norman, Steve Backers, Care Innovations, or any Care Innovations employee under surveillance.

IT IS FURTHER ORDERED that Defendant Morrison is RESTRAINED AND ENJOINED from entering or being within 500 feet or two blocks of the residence or place of employment of Bonnie Norman, Steve Backers, Care Innovations, or any Care Innovations employee.

IT IS FURTHER ORDERED THAT Defendant Morrison is RESTRAINED AND ENJOINED from making threats to any individual protected by this Order while that individual is going to or departing from court proceedings and while in the courthouse.

IT IS FURTHER ORDERED THAT Defendant Morrison is RESTRAINED AND

ENJOINED from knowingly and willfully publishing, transmitting, reproducing, communicating, disseminating, selling, distributing, displaying (on the Internet or otherwise), or circulating any statements about Bonnie Norman, Steve Backers, Care Innovations, or any Care Innovations employee that falsely allege that they engage in or are associated with, the criminal acts of child pornography or pedophilia, including the Harrassing Website, which shall be immediately removed and shall remain unavailable for the pendency of this Order.

IT IS FURTHER ORDERED THAT Defendant Morrison is RESTRAINED AND ENJOINED from knowingly and willfully publishing, transmitting, reproducing, communicating, disseminating, selling, distributing, displaying (on the Internet or otherwise), or circulating any statements about Bonnie Norman, Steve Backers, Care Innovations, or any Care Innovations employee that falsely allege that they engage in or are associated with, criminal acts or act of moral turpitude.

IT IS FURTHER ORDERED that this Order shall become effective immediately upon the posting by Plaintiffs of a security bond in the amount of one dollar (\$1.00).

IT IS FURTHER ORDERED that the parties shall appear before The Honorable Commissioner Carlos Velategui in the Superior Court for King County, Washington. Room W-325, on the hearing on Plaintiff's Motion for Preliminary Injunction on November 15, 2013, at 10:30 Am. At that 1 . At that hearing, defendant Morrison is hereby ORDERED TO SHOW CAUSE why a preliminary injunction should not be entered extending the terms of the temporary restraining order set forth herein until a trial on the merits of Plaintiffs' claims.

IT IS FURTHER ORDERED that this Court retains jurisdiction over this matter.

DONE IN OPEN COURT at loid nd/p.m. on this 1st day of November, 2013.

King County Commissioner Carlos Velategui

Commissioner Cerics Veletiggui

Presented by: **NEWMAN DU WORS LLP** Derek A. Newman WSBA No. 26967 Derek Linke, WSBA No. 38314 Attorneys for Plaintiffs