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CONFORMED COPY
 OF ORIGINAL FILED
 Los Angeles Superior Court

JAN 17 2007

John A. Clarke, Executive Officer/Clerk

By S. Funk, Deputy

7 Attorney for Plaintiff
 8 Steven Rambam

9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 10 **FOR THE COUNTY OF LOS ANGELES**

12 STEVEN RAMBAM aka Steven Rombom,) Case No. SC092414
13)
14 Plaintiff,) CREDITOR'S ACTION FOR
15) EQUITABLE AND INJUNCTIVE
16 vs.) RELIEF
17)
18 ENOM, INC., A Nevada Corporation,)
19 DEMAND MEDIA, INC., A Delaware)
20 Corporation, A. J. WEBERMAN, and Does)
21 1 to 10, inclusive)
22) INITIAL CASE MANAGEMENT REVIEW
23) AND CONFERENCE
24 Defendants.)

LISA HART COLE

MAY 07 2007
 Def X
 8:30 AM

22 For his creditor's action, plaintiff alleges as follows:

23
 24 1. Plaintiff Steven Rambam, also known as Steven Rombom ("Rambam") is a
 25 competent individual over the age of 18 years old.
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1 2. Defendant Enom, Inc. ("ENOM") is a corporation that is organized and
2 existing under the laws of the State of Nevada, which operates in the State of Washington
3 and has registered in that state. Demand Media, Inc owns Enom, Inc.
4

5 3. Defendant Demand Media, Inc. is a Delaware Corporation, which has
6 qualified to do business in the State of California and does business from offices in Santa
7 Monica, California and Bellevue, Washington. Demand Media's principal place of business
8 is in the State of California, County of Los Angeles.
9

10 4. Defendant A. J. Weberman ("Weberman") is a resident of the State of New
11 York and the Judgment Debtor of a New York Judgment, which has been entered in
12 California as a Sister State Judgment.
13

14 5. The true names and capacities, whether individual, corporate, associate or
15 otherwise, of defendants herein named as Does 1 through 10 inclusive, are unknown to
16 plaintiff who, therefore sues said defendants by such fictitious names. Plaintiff is informed
17 and believe and based thereon alleges that the Doe defendants are persons who hold real
18 and/or personal property for A.J. Weberman in order to prevent plaintiff, and other
19 similarly situated judgment creditors, from collecting debts Weberman owes.
20

21 6. On April 29, 2003, this Court entered a Sister State Judgment for Plaintiff
22 Steven Rambam and against Weberman, and others, in the amount of \$851,224.50. A true
23 and correct copy is attached hereto as Exhibit "1". The judgment remains substantially
24 unpaid and accumulating interest.
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1 7. This is a creditor's action against Defendants based on Defendants' control
2 and/or possession of intangible personal property of Weberman, namely the registration
3 rights to Internet domains as follows:

4 Garbology.com

5 Dylanology.com

6 Steверombom.com

7 JDO.org

8 Dennisking.org

9
10
11 This action **does not** allege or even suggest any wrongdoing on the part of Enom, Inc. or
12 Demand Media, Inc.

13 7. Plaintiff is informed and believes and based thereon alleges that defendants,
14 including Doe defendants, are in possession and control of assets, including without
15 limitation the real properties and personal property, choate and inchoate in which the
16 judgment debtor has an interest.

17
18 8. Accordingly, pursuant to Code of Civil Procedure § 708.210, plaintiff is
19 entitled to a judgment to force the sale of any such properties or other assets, and apply the
20 proceeds to the satisfaction of the judgment in the underlying action.

21
22 9. Moreover, pursuant to Code of Civil Procedure § 708.240, plaintiff is entitled
23 to a temporary restraining order and an injunction preventing the transfer or other
24 disposition of the registration rights to Internet domains: Garbology.com, Dylanology.com,
25 Steверombom.com, JDO.org, and Dennisking.org.

1 WHEREFORE, plaintiff seeks a judgment against defendants, and each of them, as
2 follows:

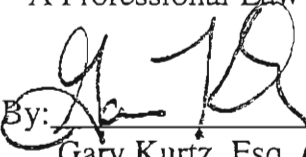
3 1. A judgment to force the sale of any such properties or other assets, and apply
4 the proceeds to the satisfaction of the judgment in the underlying action;

5 2. A temporary restraining order and an injunction preventing the transfer or
6 other disposition of the registration rights to Internet domains: Garbology.com,
7 Dylanology.com, Steverombom.com, JDO.org, and Dennisking.org.

8 3. Any additional and further relief appropriate under the law and facts of this
9 action.

10 Dated: January 16, 2007

LAW OFFICE OF GARY KURTZ
A Professional Law Corp.

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16 By: 

Gary Kurtz, Esq., Attorney for
Plaintiff Steven Rambam

DECLARATION OF GARY KURTZ

I, Gary Kurtz, declare:

1. I am an attorney duly licensed to practice in California and before this Court and am counsel of record for Plaintiff Steven Rambam. The facts set forth in this Declaration are based on my personal knowledge, and if called and sworn as a witness in this matter, I could and would testify to the following:

2. Judgment Creditor is attempting to collect on a judgment, which was entered after a jury verdict on a defamation cause of action. Attached hereto as Exhibit "1" is a true and correct copy of the Sister State Judgment.

3. Judgment Debtor is still publishing defamation about Mr. Rambam using the web sites at issue in this action. For example, the acidtrip.com website accuses Mr. Rambam of being a child molester, among other false accusations. Attached hereto as Exhibit "2" are selected pages from that web site. The jdo.org website accuses Mr. Rambam of being a terrorist, a criminal, and other false, offensive items. Attached hereto as Exhibit "3" are selected pages from that web site.

4. My understanding from experience and belief is that the web sites at issue have value because of their age and unusual content. The requested order will not likely stop the defamation, but it will capitalize on it to the benefit of the victim of the defamation.

1 5. Each of the web pages at issue is registered by and through Enom, Inc.
2 Attached hereto as Exhibit "4" are true and correct copy data from the "who is" registration
3 information site demonstrating that the sites at issue belong to A. J. Weberman and are
4 registered to Enom, Inc.
5


6 6. Enom is a Nevada Corporation and is qualified to do business in Washington
7 State. It is owned by Demand Media, Inc. Attached hereto as Exhibit "5" are true and
8 correct printouts from the web pages of Enom, the Nevada Secretary of State and the
9 Washington Secretary of State.
10

11 7. Demand Media, Inc, is a Delaware Corporation and is qualified to do
12 business in California. Demand Media, Inc. is located in Santa Monica, California.
13 Attached hereto as Exhibit "6" are true and correct printouts from web pages of Demand
14 Media, Inc., the Delaware Secretary of State and the California Secretary of State.
15

16 8. This process, which starts with a creditor's action and injunctive relief, and
17 then moves to the appointment of a receiver to sell the web pages and terminate the lawsuit,
18 was successfully tried in an action entitled *Kurtz v. Network Solutions, Inc.*, LASC Case
19 No. LC 073703. That web page – which contained defamatory information about
20 Plaintiff's Counsel resulting in a judgment exceeding \$200,000.00 – was sold pursuant to
21 the same procedure anticipated in this case. That procedure started with the same
22 temporary restraining order and order to show cause re preliminary injunction requested
23 herein.
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1 9. I did not give notice of this ex-parte application to the Weberman because I
2 am concerned that he would just change the registration to avoid collection. I did not give
3 notice to Enom or Demand Media because I was concerned that they would inform
4 Weberman of this application, thus allowing him to change the registration to avoid
5 collection. The registration of all of the web sites at issue could be transferred between the
6 time required for statutory notice and the time of an ex-parte hearing the following day.
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10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct. Executed on January 14, 2006, at Woodland Hills, California

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15 Gary Kurtz
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