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Attorneys for Plaintiffs

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

MEGAN WELTER an individual;

Plaintiff,

v.

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

NO.

**[PROPOSED] STIPULATED
ORDER FOR PERMANENT
INJUNCTION**

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

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

2. Defendant and/or Defendant's Agents, affiliates, and/or other
person/entity assisting or enabling Defendant's publication of the below-referenced
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
28

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6. To the extent Defendant and/or Defendant's Agents are unable to remove any Content from any Forum, Defendant and/or Defendant's Agents shall immediately take all reasonable actions requested by Plaintiffs to assist Plaintiffs in removing such Content and/or having the Content rendered unsearchable;

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

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

9. All Parties shall be deemed to have appeared and waive all objections to jurisdiction. The Court shall retain jurisdiction to the extent it is necessary to amend this order.

DATED this _____ day of _____, 2016.

The Honorable _____, Judge
Maricopa County Superior Court

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1 **APPROVED AS TO**
2 **FORM AND CONTENT**

3 _____
4 Ryan McMahon
5 _____
6 _____

Dated: __/__/__

7 _____
8 Megan Welter

Dated: __/__/__

9
10 **KELLY / WARNER, PLLC**

11 _____
12 Raeesabbas Mohamed, Esq.
13 8283 N. Hayden Rd., Suite 229
14 Scottsdale, Arizona 85258
15 *Attorney for Plaintiff*

16 **COPY** of the foregoing filed
17 electronically on this same date with
18 the Clerk of the Superior Court.

19 **COPY** of the foregoing
20 mailed on this same date to:

21 Ryan McMahon
22 _____
23 _____

24 _____
25 Anne E. Griffith
26
27
28