

SUE SEEBERGER
ATTORNEY AT LAW
5975 Kentshire Dr., Suite D
Dayton, Ohio 45440-4264

May 4, 2012

VIA FEDERAL EXPRESS
8726 1172 8566

Heather Dobrott (aka "Soapbox Mom")
Paul Dobrott
2518 Suncrest Drive
Garland, Texas 75044-7032

Re: **CEASE AND DESIST DEFAMATORY INTERNET
POSTINGS**

Dear Mr. and Mrs. Dobrott:

I represent Don Allen Holbrook, LLC. **YOU ARE TO IMMEDIATELY CEASE AND DESIST ALL DEFAMATORY INTERNET POSTINGS REGARDING DON ALLEN HOLBROOK, LLC, INCLUDING BUT NOT LIMITED TO, ANY AND ALL OTHER DEFAMATORY PUBLICATIONS OF DIGITAL AND/OR ELECTRONIC COMMUNICATIONS REGARDING, CONCERNING, OR RELATING TO DON ALLEN HOLBROOK, LLC.** You are to immediately cease and desist unless you or your attorney provide me with full and complete copies of any and all evidence **no later than 5:00 p.m. EDT on Friday, May 11, 2012**, that each and every statement that either of you has posted anywhere on the internet, including but not limited to any newspaper websites and Amazon, regarding, concerning, or relating to Don Allen Holbrook, LLC, is true as a matter of fact. If you have any evidence of any kind that you have provided to any federal or state agencies relating to any allegations of fraudulent and/or criminal activities regarding, concerning, or relating to Don Allen Holbrook, LLC, you or your attorney will also provide me with full and complete copies of any and all evidence supporting these allegations **no later than 5:00 p.m. EDT on Friday, May 11, 2012**. I strongly suggest that you talk to your attorney about your internet activities immediately. If you do not have an attorney, I strongly suggest that hire an attorney immediately.

Libel and slander are unlawful in the State of Ohio. See Section 2739.01 of the Ohio Revised Code. Truth is a complete defense to defamation under Ohio law. See Section 2739.02 of the Ohio Revised Code. The Ohio Supreme Court ruled in Kauffman Racing Equipment, L.L.C. v. Roberts, 2010-Ohio-2551, 930 N.E.2d 784, 126 Ohio St.3d 81, that Ohio courts have personal jurisdiction over out of state residents who publish defamatory comments on the internet which are seen by Ohio residents and cause tortious injury within the State of Ohio. At this time, I know of at least 3 persons within the State of Ohio who have seen your defamatory postings and I have reason to believe that many more Ohioans, as well as residents of other states where Don Allen Holbrook, LLC has conducted or intends to conduct business, have seen them also. I also have reason to believe that your defamatory postings have tortiously interfered with

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the business interests of Don Allen Holbrook, LLC and that such postings will continue to cause tortious injury. These postings are causing actual damage to his business reputation, good will, and to his ability to earn a living. Moreover, if you are acting in concert with anyone else, such as [REDACTED] posting defamatory comments about Don Allen Holbrook, LLC on any websites, contacting his prospective business clients, and contacting entities with which Don Allen Holbrook, LLC had contracts, an Ohio court may find that you are engaged in a civil conspiracy to defame and destroy the reputation of Don Allen Holbrook, LLC, his ability to practice his profession, and earn a livelihood. Under Ohio law, tortious interference and civil conspiracy are intentional torts with the ability to recover compensatory damages, punitive damages, and attorneys' fees and costs from a defendant.

It is likely that Don Allen Holbrook, LLC, will be bringing legal action against both of you for compensatory damages to its business, reputation, good will, lost profits, punitive damages, all of its attorneys' fees and expenses, among other damages that may be sought from you unless you:

(1) immediately cease and desist from any and all internet postings making defamatory comments about Don Allen Holbrook, LLC, whether acting or alone or in concert with anyone else;

(2) provide me with complete evidence of the truth of each and every statement and comment that you have posted anywhere on the internet;

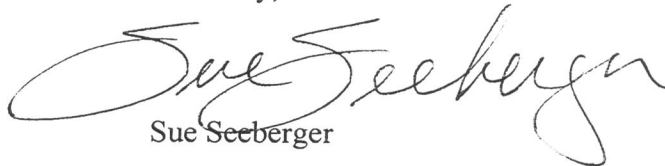
(3) provide me with complete evidence of the truth of any allegations of fraudulent and/or criminal activities, including evidence of jury verdicts finding Don Allen Holbrook, LLC to be liable for any fraudulent activities and/or any criminal convictions;

(4) publish complete and thorough retractions of all of your previous internet postings about Don Allen Holbrook, LLC; and

(5) completely stop and refrain from any further communications, on the internet or otherwise, defaming Don Allen Holbrook, LLC.

I am also aware of a recent jury verdict in Clarksville, Texas of \$13 million dollars in favor of Mark and Rhonda Leshner, who were the victims of vicious and defamatory internet postings. Under Ohio law and under Texas law, from what I have seen in the Leshner case, persons who publish defamatory statements and comments are fully responsible for such tortious acts and are held to be fully accountable for their conduct under the law. I will discuss these issues with your attorney, but I will not discuss this with you directly.

Sincerely,



Sue Seeberger

c: Don Allen Holbrook, LLC