

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO
CIVIL DIVISION

ELLORA'S CAVE PUBLISHING, INC.,

Case No.: CV-2014-09-4421

Plaintiffs,

JUDGE GALLAGHER

vs.

DEAR AUTHOR MEDIA NETWORK,
LLC,

JOINT MOTION FOR CONTINUANCE
OF TEMPORARY
RESTRAINING ORDER HEARING

Defendants.

NOW COME COUNSEL for both Plaintiffs, Ellora's Cave Publishing, Inc., and Jasmine-Jade Enterprises, LLC, and Defendants, Dear Author Media Network, LLC, and Jennifer Gerrish-Lampe, and hereby submit this Joint Motion for a Continuance of the Temporary Restraining Order Hearing. Counsel agree:

1. Plaintiff filed for a Temporary Restraining Order on September 26, 2014, seeking to have the article that is the subject of this lawsuit removed from the Internet.

2. In lieu of a hearing on the issues on September 30, 2014, the parties agreed to a full airing of the issues at a preliminary injunction hearing to be held starting at 9 a.m. on Monday, October 27, 2014. The status quo shall be maintained pending the outcome of the hearing on October 27.

Daniel M. Horrigan, Summit County Clerk of Courts

3. In the interim, all parties agree that neither they, nor anyone under their direct control, shall post on the Internet any comments specifically and directly related to the factual allegations that form the basis of Ellora Cave's defamation complaint; further, they agree not to comment online, directly or indirectly, on the allegations that form the basis of the defamation complaint. Nothing herein shall prohibit Plaintiffs from responding to defamatory posts or re-posts made by third parties related to the issues raised in this litigation.

4. Except as provided for herein, nothing in this agreement prevents either party from blogging or otherwise commenting – on the Internet or otherwise – about any other matter. Defendants reserve the right to solicit witnesses – online and otherwise – who may aid in their defense of the underlying allegations.

Respectfully submitted,

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