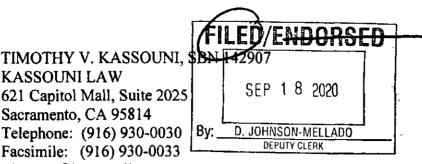
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KASSOUNI LAW

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Attorneys for Plaintiff Kassouni Law and Timothy V. Kassouni

SUPERIOR COURT OF THE STATE OF CALIFORNIA CITY AND COUNTY OF SACRAMENTO

KASSOUNI LAW; TIMOTHY V. KASSOUNI,

v.

Plaintiffs

DARRELL ARCHER; DOES 1 through 10, inclusive,

Defendants

Case No: 34-2020-00283670

CEK

[PROPOSED] TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION

Date: September 18, 2020

Time: 10:15 A.M.

Dept.: 54

Judge: Hon. Christopher E. Krueger

ORDER TO SHOW CAUSE

To Defendant Darrell Archer:

Based upon the Verified Complaint for Damages and Injunctive Relief filed in this action, and the supporting declaration and memorandum of points and authorities, you are ordered to appear on 11/17/2020 at 9:00 A.M. in Department 54 of this Court, located at 813 6th Street, Sacramento, CA, to show cause why a preliminary injunction should not be granted ordering Defendant Darrell Archer and his affiliated entities, agents, representatives, and all persons in active concert or participation with him, to immediately take down and remove his internet website timothykassouni.com and any other website or social media forum containing

[Proposed] Order

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the same or similar defamatory comments regarding Timothy Kassouni and Kassouni Law. pending trial in this action. The defamatory statements include descriptions of Timothy Kassouni as "very deceitful," a "Crook, Thief, Cheat," operating a "Scam," "Cannot be Trusted," a "fraud," "charged more than agreed," "failed to provide agreed services," "No Honor No Ethics," an "Overcharging Scam Artist Crook," and "cowardly."

TEMPORARY RESTRAINING ORDER

Pending hearing on the Order to Show Cause, Defendant Darrell Archer is ordered to immediately take down and remove his internet website timothykassouni.com and any other website or social media forum containing the same or similar defamatory comments regarding Timothy Kassouni and Kassouni Law. The defamatory statements include descriptions of Timothy Kassouni as "very deceitful," a "Crook, Thief, Cheat," operating a "Scam," "Cannot be Trusted," a "fraud," "charged more than agreed," "failed to provide agreed services," "No Honor No Ethics," an "Overcharging Scam Artist Crook," and "cowardly." Failure to take down the website timothykassouni.com and any other website or social media forum containing the same or similar defamatory comments regarding Timothy Kassouni and Kassouni Law within 24 hours of service of this order via e-mail may be punished by contempt.

It is further ordered that the internet website hosting company GoDaddy.com and/or any other internet service that "hosts" Defendant Darrell Archer's website timothykassouni.com, take down and remove that website within three days of receiving notice of this order by email, fax, and/or certified U.S. Mail.

IT IS FURTHER ORDERED THAT:

This Order to Show Cause and Temporary Restraining Order and supporting papers shall be served on defendant no later than _____ by mail and electronic mail. Proof of such service shall be filed at least three court days prior to the hearing.

KASSOUNI LAW
621 Capitol Mall, Ste 2025
Sacramento, CA 95814
Tel: (916) 930-0030 ◆ Fax: (916) 930-0033

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[Proposed] Order