

KASSOUNI LAW
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FILED/ENDORSED
SEP 18 2020
By: D. JOHNSON-MELLADO
DEPUTY CLERK

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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,

Plaintiffs

v.

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

SEP 17 2020
RECEIVED
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1 the same or similar defamatory comments regarding Timothy Kassouni and Kassouni Law,
2 pending trial in this action. The defamatory statements include descriptions of Timothy Kassouni
3 as "very deceitful," a "Crook, Thief, Cheat," operating a "Scam," "Cannot be Trusted," a
4 "fraud," "charged more than agreed," "failed to provide agreed services," "No Honor No
5 Ethics," an "Overcharging Scam Artist Crook," and "cowardly."

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8 TEMPORARY RESTRAINING ORDER

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

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

*Including
Amazon Technologies, Inc.*

23 IT IS FURTHER ORDERED THAT:

24 This Order to Show Cause and Temporary Restraining Order and supporting papers shall
25 be served on defendant no later than 10/23/2020 by mail and electronic mail. Proof of such service
26 shall be filed at least three court days prior to the hearing.
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Any opposition papers to the Order to Show Cause shall be filed and served on Plaintiffs by mail and electronic mail no later than 11/3/2020. Any reply papers to the opposition shall be filed and served on Defendants by mail and electronic mail no later than 11/9/2020.

The restraining order granted herein shall expire on 11/17/2020.

Date: 9/18/2020

CEK E. KB

Judge of the Superior Court
CHRISTOPHER E. KRUEGER

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