

# EXHIBIT K

MARYLAND CIRCUIT COURT  
BALTIMORE CITY

R. DEREK RUDDIE,

Plaintiff,

vs.

JAKE KIRSCHNER,

Defendants.

No. 24-C-15-005620

**ORDER GRANTING CONSENT MOTION  
FOR INJUNCTION AND FINAL JUDGMENT**

The parties having filed a Consent Motion for Injunction and Final Judgment, and therefore, good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:


1. The Court finds that Defendant Kirschner (“Defendant”) posted false and defamatory statements about Plaintiff R. Derek Ruddle (“Plaintiff”) on the following webpage(s): <http://www.ripoffreport.com/r/DANIEL-WARNER-KELLY-WARNER-LAW//DANIEL-WARNER-KELLY-WARNER-LAW-Daniel-R-Warner-Daniel-Warner-Lawyer-FROM-Kelly-Warner-Law-1231611> (the “Defamation”).
2. The Defamation is not otherwise protected by the First Amendment.
3. Defendant shall remove the Defamation.

4. If the Defendant cannot remove the Defamation from the Internet, the Plaintiff shall submit this Order to Google, Yahoo, Bing, or any other Internet search engine so that the link can be removed from their search results pursuant to their existing policies concerning de-indexing of defamatory material.

5. Upon entry of this Order, this matter shall be closed.

14<sup>TH</sup> DAY OF DECEMBER  
DATED this ~~10th day of November~~, 2015.


The Judge's signature appears  
on the original documents

  
Judge Jeffrey M. Goff

APPROVED AS TO  
FORM AND CONTENT



\_\_\_\_\_  
Jake Kirschner  
55 6<sup>th</sup> Avenue  
New York, NY  
*Pro Per Defendant*

  
\_\_\_\_\_  
R. Derek Ruddle  
12 Dorset Hill Court  
Owings Mills, MD. 21117

MARYLAND CIRCUIT COURT  
BALTIMORE CITY

R. Derek Ruddle,

Plaintiff,

vs.

JAKE KIRSCHNER,

Defendants.

No. 24-C-15-005620

CIVIL DIVISION

2015 NOV 18 PM 2:28

**CONSENT MOTION**  
**FOR INJUNCTION AND FINAL JUDGMENT**


The parties respectfully request that the Court enter the proposed order submitted herewith. Although the parties have settled this matter, Defendant is unable to remove the defamatory statements he posted about Plaintiff on RipoffReport.com because of the website's policies. As result, the only way to suppress the defamation is to submit a court order to Google and the other search engine results.


Therefore, the Parties respectfully request that the Court enter the proposed Order submitted herewith and grant such other and further relief as the Court finds reasonable and necessary.

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Dated, so respectfully, this 10th day of November, 2015

  
Richard Ruddie  
12 Dorset Hill Court  
Owings Mills, MD. 21117  
*Pro Per Plaintiff*

  
Jake Kirschner  
55 6<sup>th</sup> Avenue  
New York NY 10001  
*Pro Per Defendant*

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*Pro Per Plaintiff*

MARYLAND CIRCUIT COURT  
BALTIMORE CITY

R. DEREK RUDDIE,

Plaintiff,

vs.

JAKE KIRSCHNER,

Defendants.

No. \_\_\_\_\_

JUDICIAL DIVISION

2015 NOV 10 PM 3:04

COMPLAINT

For his claims for relief against Defendant, Plaintiff R. Derek Ruddle ("Plaintiff") alleges as follows:

**PARTIES, JURISDICTION AND VENUE**

1. Plaintiff maintains a primary residence in Baltimore County, Maryland.
2. Defendant Jake Kirschner ("Defendant") maintains a primary residence located in New York, New York.
3. Defendant's actions, upon which the allegations in this Complaint are based, were performed in this judicial district.
4. Therefore, upon information and belief, jurisdiction and venue are proper in this Court.

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**COUNT I  
DEFAMATION**

5. On 10/01/2015, Defendant posted false and defamatory statements on the internet at the following web address: <http://www.ripoffreport.com/r/DANIEL-WARNER-KELLY-WARNER-LAW//DANIEL-WARNER-KELLY-WARNER-LAW-Daniel-R-Warner-Daniel-Warner-Lawyer-FROM-Kelly-Warner-Law-1231611> (the "Defamation").

6. The Defamation Falsely implies that I am involved in a scheme or fraud.

Falsely implies that I am involved in a scheme or fraud.

7. The Defamation was made by Defendant about and concerning Plaintiff.

8. Without privilege, Defendant communicated the Defamation to third parties through the Internet to world at large, without limitation.

9. The Defamation made by Defendant impeaches the honesty, integrity and reputation of Plaintiff by implying that Plaintiff is involved in a fraudulent scheme.

10. The Defamation is and would be highly offensive to a reasonable person.

11. The Defamation is and will continue to cause harm to Plaintiff's reputation unless it is restrained and enjoined.

12. As a direct and proximate result of the Defamation, Plaintiff has suffered and will continue to suffer immediate and irreparable harm and injury, including, but not limited to, damage to reputation.



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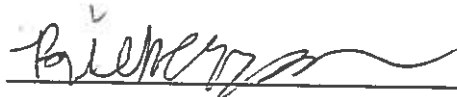
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13. Plaintiff has no adequate remedy at law and will continue to suffer irreparable harm unless the appropriate relief is granted.

**WHEREFORE**, Plaintiff prays judgment against Defendant as follows:

1. For a permanent injunction compelling Defendant to remove the Defamation from the Internet;
2. For a permanent injunction compelling Defendant to suppress the Defamation from the Internet in the event Defendant cannot remove the Defamation; and
3. For such other and further relief as the Court deems just and proper.

Dated, so respectfully, this 10th day of November, 2015



R. Derek Ruddle  
12 Dorset Hill Court  
Owings Mills, MD. 21117  
*Pro Per Plaintiff*