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1 **KELLY / WARNER, PLLC**
2 8283 N. Hayden Road, Suite 229
3 Scottsdale, Arizona 85258
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9 *Attorneys for Plaintiff*

STC (Tele)
6/29/2016
@ 3pm
FILED
6-29-16 3:30pm.
MICHAEL K. JEANES, Clerk
By T. DeRaddo
T. DeRaddo, Deputy

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **IN AND FOR THE COUNTY OF MARICOPA**

12 MEGAN WELTER an individual;
13
14 Plaintiff,

NO. CV2016-004734

15 v.

**STIPULATED ORDER FOR
PERMANENT INJUNCTION**

16 JOHN and JANE DOES 1-10 are fictitious
17 persons who may have an interest herein.
18 ABC PARTNERSHIPS 1-10; XYZ
19 CORPORATIONS 1-10; and DEF
20 LIMITED LIABILITY COMPANIES 1-10,
21 Defendants.

22 Pursuant to stipulation of the Parties, and good cause appearing therefore, IT IS
23 ORDERED, ADJUDGED AND DECREED that:

24 1. Plaintiff is awarded a permanent injunction against enjoining Defendant
25 Ryan McMahon, from publishing false and defamatory statements concerning Plaintiff,
26 and enjoining Plaintiff from publishing false and defamatory statements concerning
27 Defendant Ryan McMahon, and compelling removal of the uniform resource locators
28 ("URLs") in **Exhibit A**, attached hereto.

1. Defendant and/or Defendant's Agents, affiliates, and/or other
person/entity assisting or enabling Defendant's publication of the below-referenced
Content (collectively "Defendant's Agents"), shall immediately remove from all

1 websites, search engines, forums, blogs, lists, social media sites, and/or other forums
2 of mass communication (collectively "Forums"), all negative statements, material,
3 and/or information pertaining to Plaintiff and/or any agent/affiliate thereof (the
4 "Content"), including, but not limited to, the Content located at the following URLs,
5 attached as **Exhibit A**, and/or any variations thereof, as well as any search terms
6 and/or URLs that are related, directly or indirectly, or would be reasonably calculated
7 to lead, to the Content or any of the URLs.
8

9 3. Defendant admits that all or substantially all of the statements made in
10 the URLs are false and defamatory.

11 4. Defendant and/or Defendant's Agents shall immediately remove from all
12 Forums any and all Content, references to the Content, partial references to the
13 Content, and/or references to partial Content, including, but not limited to, indexing
14 URLs, index pages, subpages, inner pages, headers, headings, title tags, H1 tags,
15 meta tags, deep links, navigation menus, footers, filenames, ALT text parameters,
16 structured data, semantic data, images, PDFs, slideshows, multimedia files, and
17 search suggestions;
18

19 5. As it is foreseeable that the above-referenced URLs and/or Content will
20 be referenced on additional webpages in the future (as a result of indexing, re-
21 indexing, directory development, search result pages, etc.), Defendant and/or
22 Defendant's Agents shall immediately take all actions, including requesting removal
23 of the URLs from all Internet search engines, including, but not limited to,
24 Google, Yahoo!, and Bing, to remove all such webpages and cache from the
25 Internet, such that the Content is rendered unsearchable;
26
27
28

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1 6. To the extent Defendants and/or Defendants' Agents are unable to
2 remove any Content from any Forum, Defendants and/or Defendants' Agents shall
3 immediately take all reasonable actions requested by Plaintiffs to assist Plaintiffs in
4 removing such Content and/or having the Content rendered unsearchable;

5 7. The Parties and their Agents shall not post any Content, defamatory or
6 negative material or information about each other and/or any agent/affiliate thereof on
7 any Forum;

8 8. The Parties and their Agents shall not publish (orally in writing) any
9 Content, defamatory or negative material or information about Plaintiffs and/or any
10 agent/affiliate thereof to any third party; and
11

12 9. All Parties shall be deemed to have appeared and waive all objections to
13 jurisdiction. The Court shall retain jurisdiction to the extent it is necessary to amend this
14 order, *until the matter is dismissed.*

15 DATED this 29th day of JUNE, 2016.
16

17
18 
19 _____
20 The Honorable Patricia Starr, Judge
21 Maricopa County Superior Court
22
23
24
25
26
27
28

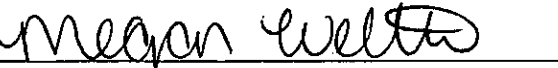
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1 APPROVED AS TO
2 FORM AND CONTENT

3 

Dated: 5/19/2016

4 Ryan McMahon
5 ~~c/o 8283 N. Hayden Road, #229~~
6 ~~Scottsdale, AZ 85258~~

7 

Dated: 5/20/2016


8 Megan Welter

9
10 **KELLY / WARNER, PLLC**

11 /s/ Raeesabbas Mohamed
12 Raeesabbas Mohamed, Esq.
13 8283 N. Hayden Rd., Suite 229
14 Scottsdale, Arizona 85258
15 *Attorney for Plaintiff*

16 **COPY** of the foregoing filed
17 electronically on this same date with
18 the Clerk of the Superior Court.

19 **COPY** of the foregoing
20 mailed on this same date to:

21 Ryan McMahon
22 
23 c/o 8283 N. Hayden Road, #229
24 Scottsdale, AZ 85258

25 /s/ Anne E. Griffith
26 Anne E. Griffith
27
28

EXHIBIT A

LINKS TO REMOVE FROM SEARCH RE: "MEGAN WELTER":

1. <http://abcnews.go.com/US/iraq-war-vet-turned-nfl-cheerleader-arrested-allegedly/story?id=19861885>
2. <http://www.abc15.com/news/region-northeast-valley/scottsdale/cardinals-cheerleader-arrested-after-fight-with-boyfriend>
3. http://media2.abc15.com//photo/2013/08/01/Megan_Welter_20130801155754_320_240.JPG
4. http://i.dailymail.co.uk/i/pix/2013/08/02/article-2383667-1B1E732F000005DC-959_1024x615_large.jpg
5. http://insider.foxnews.com/sites/insider.foxnews.com/files/styles/780/public/080213_cheerleader_234_0.jpg?itok=mh2g7zoT
6. <http://heavy.com/entertainment/2013/08/megan-welter-cheerleader-iraq-vet-arrested/>
7. <https://www.google.com/imgres?imgurl=http%3A%2F%2Fheavyeditorial.files.wordpress.com%2F2013%2F08%2Fmegan2.jpeg%3Fquality%3D65%26strip%3Dall%26w%3D780&imgrefurl=http%3A%2F%2Fheavy.com%2Fentertainment%2F2013%2F08%2Fmegan-welter-cheerleader-iraq-vet-arrested%2F&docid=JSczbzJYLcOgcM&tbnid=7ssiqXjzjVg4yM%3A&w=480&h=600&bih=726&biw=1099&ved=0ahUKEwi7ns7cweLMAhUC1WMKHQ6PB9cQMwhaKB4wHg&iact=mrc&uact=8>
8. <http://heavyeditorial.files.wordpress.com/2013/08/cheerleader.gif?w=780>
9. <http://www.abc15.com/news/region-northeast-valley/scottsdale/scottsdale-police-release-video-of-arizona-cardinals-cheerleader-megan-welter-moments-before-arrest>
10. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
11. <http://www.nydailynews.com/news/crime/arizona-cardinals-cheerleader-beat-boyfriend-victim-article-1.1415958>
12. <http://www.newsmax.com/TheWire/megan-welter-cheerleader-arrested-assault/2013/08/05/id/518697/>
13. <http://www.foxsports.com/nfl/story/arizona-cardinals-cheerleader-megan-welter-iraq-vet-charged-with-alleged-assault-080213>

14. <http://uproxx.com/sports/please-forget-all-the-nice-stuff-we-said-about-megan-welter-the-iraq-vet-cheerleader/>
15. <http://www.ibtimes.com/video-arizona-cardinals-cheerleader-megan-welter-beats-boyfriend-iraq-veteran-arrested-assault>
16. <http://www.dailymail.co.uk/news/article-2383667/Arizona-Cardinals-cheerleader-Iraq-war-vet-arrested-beating-boyfriend-flirty-text-sent-girlfriend.html>
17. <http://nesn.com/2013/07/arizona-cardinals-megan-welter-goes-from-army-lieutenant-fighting-in-iraq-to-nfl-cheerleader-video/>
18. <http://www.georgianewsdays.com/news/national/166994-arizona-cardinals-cheerleader-and-iraq-war-vet-megan-welter-arrested-for-beating-boyfriend-over-flirty-text.html>
19. https://www.reddit.com/r/arizona/comments/2h4f4e/arizona_cardinals_cheerleader_and_iraq_war_vet/
20. https://www.reddit.com/r/MensRights/comments/2h1mxc/nfl_cheerleader_assaults_boyfriend_then_calls/
21. <http://hollywoodlife.com/2013/08/02/megan-welter-arrested-cheerleader-assault-boyfriend-arizona-cardinals/>
22. <http://www.cbsnews.com/news/megan-welter-arizona-cardinals-cheerleader-and-iraq-war-veteran-accused-of-assaulting-her-boyfriend/>
23. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>
24. <http://bustedcoverage.com/2013/08/02/megan-welter-cardinals-cheerleader-iraq-war-vet-arrested/>
25. <http://zap2it.com/2013/07/megan-welter-meet-the-iraq-war-veteran-turned-arizona-cardinals-cheerleader/>
26. <http://www.rightthisminute.com/video/megan-welter-marine-az-cardinals-cheerleader-arrested-assault-police-call>
27. <http://www.rightthisminute.com/video/megan-welter-arizona-cardinals-cheerleader-arrested-assault-fight>
28. <https://www.pinterest.com/pin/188377196886664961/>

29. <https://www.rooshvforum.com/thread-40599.html>
30. <http://www.cbs5az.com/story/23023496/noted-az-cardinals-cheerleader-faces-assault-charges>
31. <http://fabwags.com/megan-welter-arizona-cardinals-cheerleader-army-vet-arrested-for-assaulting-boyfriend/>
32. <http://tireball.com/nfl/2013/08/02/iraq-vet-turned-cheerleader-megan-welter-arrested-for-assault/>
33. <http://www.examiner.com/article/cheerleader-megan-welter-s-drunken-attack-on-boyfriend-caught-on-tape>
34. <http://www.phoenixnewtimes.com/news/arizona-cardinals-cheerleader-arrested-for-allegedly-assaulting-boyfriend-6659503>
35. <http://www.rightentertainment.com/?p=11846>
36. <https://aikenareaprogressive.wordpress.com/2013/08/05/arizona-cardinals-cheerleader-megan-welter-charged-with-domestic-violence-for-beating-up-boyfriend/>
37. <http://ftw.usatoday.com/2013/08/war-veteran-nfl-cheerleader-arrested-on-domestic-violence-charges>
38. <http://www.metatube.com/en/videos/196112/The-Cheerleader-Megan-Welter-beating-her-boyfriend/>
39. <http://www.ecanadanow.com/megan-welter-cheerleader-charged-with-alleged-assault/68467/>
40. <http://profootballtalk.nbcsports.com/2013/08/03/cardinals-cheerleader-arrested-after-fight-with-boyfriend/>
41. <http://www.hngn.com/articles/9263/20130802/arizona-cardinals-cheerleader-nfl-iraq-war-veteran-beating-boyfriend.htm>
42. <http://radaronline.com/exclusives/2013/08/arizona-cardinals-cheerleader-accused-of-beating-up-on-pro-fighter-boyfriend/>
43. <http://www.barstoolsports.com/dont-use/arizona-cardinals-cheerleader-was-beaten-up-by-her-boyfriend-until-video-showed-him-cowering-as-she-went-bat-shit-crazy/>

44. <http://sports.yahoo.com/blogs/nfl-shutdown-corner/arizona-cardinals-cheerleader-iraq-war-vet-arrested-domestic-192722568.html>
45. <http://www.mensrightsofarizona.com/false-911-dv-calls.html>
46. <http://www.urbanentertainmentnews.com/2013/08/wtf-arizona-cardinals-cheerleaderarmy.html>
47. <http://www.azcentral.com/community/scottsdale/articles/20130801cards-cheerleader-accused-assaulting-her-boyfriend.html>
48. <http://www.yellowbullet.com/forum/showthread.php?t=598464>
49. <http://theuniversityofleft.tumblr.com/>
50. <http://www.businessinsider.com.au/nfl-cheerleader-fights-boyfriend-in-alleged-video-2013-8>
51. <http://mstarsnews.musictimes.com/articles/17436/20130803/megan-welter-arizona-cardinals-cheerleader-charged-with-assault-cell-phone-police-video-watch-911-call-iraq-war-veteran-beat-boyfriend-ryan-mcmahon.htm>
52. <http://abcnews.go.com/US/iraq-war-vet-turned-nfl-cheerleader-arrested-allegedly/story?id=19861885>
53. <http://www.ibtimes.com/video-arizona-cardinals-cheerleader-megan-welter-beats-boyfriend-iraq-veteran-arrested-assault>
54. <http://www.theblaze.com/stories/2013/08/02/nfl-cheerleader-who-served-in-iraq-arrested-for-assault-see-the-police-video/>
55. <http://www.sportsgrid.com/nfl/arizona-cardinals-cheerleader-who-is-also-iraq-war-vet-arrested-for-assaulting-boyfriend/>
56. <http://uproxx.com/sports/please-forget-all-the-nice-stuff-we-said-about-megan-welter-the-iraq-vet-cheerleader/>
57. <http://nypost.com/2013/08/02/beautiful-nfl-cheerleader-and-army-veteran-arrested-for-allegedly-assaulting-boyfriend/>
58. <http://sports.yahoo.com/blogs/nfl-shutdown-corner/arizona-cardinals-cheerleader-iraq-war-vet-arrested-domestic-192722568.html>
59. http://www.liveleak.com/view?i=732_1377746787

60. <https://www.pinterest.com/pin/372954412862396655/>
61. <http://www.staradvertiser.com/sports/arizona-cardinals-cheerleader-accused-of-assault/>
62. <http://legacy.wtsp.com/story/news/weird/2014/03/12/2031442/>
63. <http://www.torontosun.com/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
64. http://www.upi.com/Top_News/US/2013/08/02/Vet-turned-football-cheerleader-charged-with-assault-on-boyfriend/12151375480109/
65. <http://www.wellandtribune.ca/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
66. <http://www.barstoolsports.com/dont-use/arizona-cardinals-cheerleader-was-beaten-up-by-her-boyfriend-until-video-showed-him-cowering-as-she-went-bat-shit-crazy/>
67. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>
68. <http://www.theobserver.ca/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
69. <http://legacy.king5.com/story/news/local/2014/08/04/13284972/>
70. <http://www.si.com/extra-mustard/2013/08/02/iraq-veteran-and-cardinals-cheerleader-arrested-for-allegedly-assaulting-her-boyfriend>
71. <http://www.azfamily.com/story/28370601/celebrated-cardinals-cheerleader-arrested-after-alleged-assault-caught-on-video>
72. <http://www.imdb.com/name/nm3928925/news>
73. <http://www.dreamindemon.com/community/threads/iraqi-war-vet-turned-nfl-cheerleader-arrested-for-beating-up-her-boyfriend.63859/>
74. <http://abcnewsradioonline.com/national-news/ariz-cardinals-cheerleader-arrested-for-allegedly-attacking.html>
75. <http://tlicnaptown.hellobeautiful.com/2138776/cardinals-cheerleader-beat-up-her-boyfriend-then-called-police-but-he-had-it-on-video-and-shes-in-trouble/>

76. <http://uinterview.com/news/megan-welter-iraq-vet-turned-nfl-cheerleader-was-arrested-for-alleged-assault/>
77. <http://mstarsnews.musictimes.com/articles/17436/20130803/megan-welter-arizona-cardinals-cheerleader-charged-with-assault-cell-phone-police-video-watch-911-call-iraq-war-veteran-beat-boyfriend-ryan-mcmahon.htm>
78. <http://www.sammyboy.com/showthread.php?158772-Army-veteran-turned-cheerleader-accused-of-assault>
79. <https://twitter.com/nflrt/status/363395141223972864>
80. <http://ihatelupica.blogspot.com/2013/08/cardinals-cheerleader-and-iraq-war-vet.html>
81. http://www.truecrimereport.com/2013/08/arizona_cardinals_cheerleader.php
82. <http://www.ebaumsworld.com/videos/lying-cheerleader-calls-cops-for-domestic-abuse-but-boyfriend-proves-she-was-the-attacker/84505096/>
83. http://tucson.com/news/state-and-regional/nfl-cheerleader-charged-in-boyfriend-s-assault-and-other-state/article_4a73022b-e3b8-5583-a838-6677cda69c8f.html
84. <http://blackandgold.com/nfl/59283-cardinals-cheerleader-arrested-after-fight-boyfriend.html>
85. <http://www.singsupplies.com/showthread.php?158772-Army-veteran-turned-cheerleader-accused-of-assault>
86. <https://www.avvo.com/legal-guides/ugc/arizona-cardinals-cheerleader-arrested-for-disorderly-conduct-criminal-damage--assault>
87. <http://ftw.usatoday.com/2013/08/war-veteran-nfl-cheerleader-arrested-on-domestic-violence-charges>
88. <http://theinterrobang.com/arizona-cardinals-cheerleader-charged-with-alleged-assault/>
89. <http://tireball.com/nfl/2013/08/02/iraq-vet-turned-cheerleader-megan-welter-arrested-for-assault/>

90. <http://www.mixedmartialarts.com/forums/OtherGround/Cardinals-cheerleader-biotch-charged-wit-assault:2208866-1>
91. <http://www.urbanentertainmentnews.com/2013/08/wtf-arizona-cardinals-cheerleaderarmy.html>
92. <http://www.mensrightsofarizona.com/false-911-dv-calls.html>
93. <http://rbpattersonjr.tumblr.com/post/66920910501/on-this-veterans-day-week-arizona-cardinals>
94. <http://datab.us/8ErIQ15p8j4#Cardinals%27%20cheerleader%20arrested%20after%20fight>
95. <http://gamedayr.com/sports/video-arizona-cardinals-cheerleader-megan-welter-iraq-army-assault/>
96. <http://www.cbs5az.com/story/23023496/noted-az-cardinals-cheerleader-faces-assault-charges>
97. <http://insider.foxnews.com/2014/03/10/cardinals-cheerleader-and-former-soldier-megan-welter-charged-assaulting-boyfriend>
98. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>

YOUTUBE VIDEOS:

1. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
2. <https://www.youtube.com/watch?v=YWjYHoB7xnU>
3. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
4. <https://www.youtube.com/watch?v=ccE3B778FZ0>
5. <https://www.youtube.com/watch?v=Wp7Aasz7kmw>
6. <https://www.youtube.com/watch?v=2za6nDSBfAg>
7. <https://www.youtube.com/watch?v=1avzEb8OPrQ>
8. <https://www.youtube.com/watch?v=61lx5hudS58>
9. <https://www.youtube.com/watch?v=8ErIQ15p8j4>

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4 Tel: 480-331-9397
Fax: 1-866-961-4984
5 *Attorneys for Plaintiff*

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MARICOPA**

8
9 MEGAN WELTER an individual;
10
11 Plaintiff,

NO. CV2016-004734

12 v.

**ORDER OF DISMISSAL
WITHOUT PREJUDICE**

13 JOHN and JANE DOES 1-10 are fictitious
14 persons who may have an interest herein.
15 ABC PARTNERSHIPS 1-10; XYZ
16 CORPORATIONS 1-10; and DEF
17 LIMITED LIABILITY COMPANIES 1-10,
18 Defendants.

19 Plaintiff and Defendant Ryan McMahon (“Defendant”) having stipulated to the
20 dismissal, without prejudice, of all claims/counterclaims pled or that could have been
21 pled in the above-captioned matter, with the parties to bear their own attorneys’ fees,
22 costs and costs incurred in the above-captioned matter, and good cause appearing
23 therefore.

24 IT IS HEREBY ORDERED, granting the Stipulation to Dismissal Without
25 Prejudice, with each party to bear their own attorneys’ fees and costs.

26 DATED: _____, 2016.

27
28 _____
The Honorable Patricia Ann Starr, Judge
Maricopa County Superior Court

eSignature Page 1 of 1

Filing ID: 7568553 Case Number: CV2016-004734
Original Filing ID: 7565529

Granted as Submitted



/S/ Patricia Starr Date: 7/14/2016
Judicial Officer of Superior Court

ENDORSEMENT PAGE

CASE NUMBER: CV2016-004734

SIGNATURE DATE: 7/14/2016

E-FILING ID #: 7568553

FILED DATE: 7/15/2016 8:00:00 AM

DANIEL R WARNER

RAEESABBAS MOHAMED

JOHN DOE
NO ADDRESS ON RECORD

MICHAEL K. JEANES
Clerk of the Superior Court
By Cassandra Knotts, Deputy
Date 05/20/2016 Time 14:47:12

Description	Amount
CASE# CV2016-004734	
CIVIL NEW COMPLAINT	319.00
TOTAL AMOUNT	319.00
Receipt# 25257984	

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 Attorneys for Plaintiff

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MEGAN WELTER an individual;

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 v.

 JOHN and JANE DOES 1-10 are fictitious
 persons who may have an interest herein.
 ABC PARTNERSHIPS 1-10; XYZ
 CORPORATIONS 1-10; and DEF LIMITED
 LIABILITY COMPANIES 1-10,

 Defendants.

NO. CV2016-004734

**COMPLAINT AND
 APPLICATION FOR
 INJUNCTIVE RELIEF**

(Defamation, False Light)

For her claims for relief against Defendants, Plaintiff, by and through undersigned counsel, alleges as follows:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Megan Welter ("Welters" or "Plaintiff") is an individual who resides in Arizona.
2. Defendants John and Jane Does are individuals residing within Maricopa County, Arizona.

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1 3. Defendants ABC PARTNERSHIPS 1-10; XYZ CORPORATIONS 1-10;
2 and DEF LIMITED LIABILITY COMPANIES 1-10 are entities formed or
3 otherwise doing business in Arizona.

4 4. Defendants all purposefully availed themselves to the benefits of
5 Arizona law by publishing defamatory content on Arizona-based websites, new
6 agencies, and/or by directing the tort of defamation against Plaintiff, an Arizona
7 resident.
8

9 5. Upon information and belief, Defendants have caused things to occur
10 in Maricopa County that have damaged Plaintiff.
11

12 6. Upon information and belief, all acts of each named Defendant as
13 alleged herein were performed for the benefit of each Defendant's marital
14 community.
15

16 7. JOHN and JANE DOES 1-10 are fictitious persons who may have an
17 interest herein. ABC PARTNERSHIPS 1-10; XYZ CORPORATIONS 1-10; and
18 DEF LIMITED LIABILITY COMPANIES 1-10 are fictitious entities who may have
19 an interest herein. At such time as the true name of said fictitious persons
20 and/or entities become known to Plaintiff, Plaintiff may amend their pleadings to
21 reflect same.
22

23 8. The amount in controversy herein exceeds the minimum amount
24 required for jurisdiction in this Court.
25

26 9. Upon information and belief, jurisdiction and venue are proper in this
27 Court.
28

FACTS

1
2 10. All of the allegations contained within the paragraphs above and
3 below are hereby incorporated by reference as if fully set out herein.

4
5 11. Upon information and belief, Defendants posted voluminous false,
6 damaging, misleading and defamatory statements about Plaintiff on the Internet,
7 located at numerous web links, and making a variety of untrue and damaging
8 statements and implications aimed at Plaintiff (collectively the "False
9 Statements"). The False Statements have been attached as **Exhibit "A"** hereto.

10
11 12. Upon information and belief, Defendants have posted and/or
12 contributed to posting and disseminating the false, defamatory, damaging, and
13 misleading statements about Plaintiff.

14
15 13. Plaintiff is not a criminal, and did not commit the crime of assault.

16
17 14. Defendants posted the False Statements with the intent to injure
18 Plaintiff and/or with conscious disregard of the rights of Plaintiff.

19 15. Defendants have exhibited a malicious intent and purpose.

20
21 16. Defendants failed to use reasonable efforts to ascertain the truth or
22 conduct due diligence prior to publishing the False Statements.

23 17. The False Statements made by Defendant tends to injure Plaintiff,
24 and portray her in a false light, and accuses Plaintiff of misconduct and/or attack
25 her reputation as a professional cheerleader for the Arizona Cardinals at the
26 time, and as a reservist in the military.
27
28

1 18. Plaintiff has suffered substantial harm and damages as a result of
2 these false statements and will continue to suffer damages if the defamation
3 persists.
4

5 **COUNT I – DEFAMATION AND DEFAMATION PER SE**

6 19. All of the allegations contained within the paragraphs above and
7 below are hereby incorporated by reference as if fully set out herein.
8

9 20. The False Statements made by Defendants are about and
10 concerning Plaintiff.

11 21. Without privilege, Defendants communicated the False Statements
12 to third parties via the Internet and/or intentionally made such statements on the
13 Internet, which were accessible to third parties without password protection.
14

15 22. Defendants' False Statements are and would be highly offensive to
16 a reasonable person and have been published to third parties with the apparent
17 intent of causing harm to the reputation and economic interests of Plaintiff.
18

19 23. In making and publishing the False Statements, Defendants had
20 knowledge of or acted in reckless disregard as to the falsity of the False
21 Statements.
22

23 24. Plaintiff alleges, on information and belief, that Defendants
24 published the False Statements knowing that they would be widely disseminated
25 across the world.
26

27 25. As a direct and proximate result of Defendants posting the False
28 Statements, Plaintiff has sustained, and will continue to sustain, immediate and

1 irreparable harm and injury including, but not limited to, damage to reputation,
2 losses in revenues, loss of profits, loss of goodwill, loss of business relations
3 with existing and future business prospects, and loss of competitive business
4 advantage, opportunity, and/or expectancy.
5

6 26. The written False Statements made by Defendants impeaches the
7 honesty, integrity or reputation of Plaintiff.
8

9 27. The False Statements made by Defendants constitutes defamation
10 per se and general damages are presumed as a matter of law.
11

12 28. Plaintiff has suffered general and special damages in an amount to
13 be proved at trial.

14 29. In making and publishing the False Statements, Defendants acted
15 maliciously, willfully, wantonly, and unlawfully.
16

17 30. For such willful and malicious acts, Plaintiff hereby seeks punitive
18 damages in addition to their actual damages.

19 31. Defendants' acts, omissions, conduct and transactions alleged
20 herein were aggravated, outrageous, and guided by evil motives wherein
21 Defendants intended to harm Plaintiff and/or consciously pursued a course of
22 conduct knowing that it created a substantial risk of significant harm to Plaintiff.
23

24 32. To dissuade Defendants from pursuing a similar course of conduct
25 in the future and to discourage other persons from similar conduct in the future,
26 an award of punitive damages should be awarded against Defendants in the
27
28

1 sum of sufficient magnitude to punish Defendant and to deter similar conduct by
2 others.

3 **COUNT II – APPLICATION FOR PRELIMINARY AND PERMANENT**
4 **INJUNCTION**

5 33. All of the allegations contained within the paragraphs above and
6 below are hereby incorporated by reference as if fully set out herein.
7

8 34. As a direct and proximate result of the Defendants posting the
9 False Statements, Plaintiff has sustained, and will continue to sustain,
10 immediate and irreparable harm and injury including, but not limited to, damage
11 to reputation, losses in revenues, loss of profits, loss of goodwill, loss of
12 business relations with existing and future business prospects, and loss of
13 competitive business advantage, opportunity, and/or expectancy.
14

15 35. The False Statements made by Defendants impeach the honesty,
16 integrity or reputation of Plaintiff.
17

18 36. The False Statements made by Defendants are defamatory on their
19 face.
20

21 37. There is a substantial risk that unless Defendants' wrongful acts
22 described herein are temporarily, preliminarily, and/or permanently enjoined,
23 Defendants will continue to irreparably injure Plaintiff.
24

25 38. Plaintiff has no adequate remedy at law; therefore, Plaintiff is
26 entitled to injunctive relief.
27
28

COUNT III – FALSE LIGHT / INVASION OF PRIVACY

1
2 39. All of the allegations contained within the paragraphs above and
3 below are hereby incorporated by reference as if fully set out herein.

4
5 40. Defendants published a private matter concerning Plaintiff's private
6 life to the public, including partial video footage of a private incidence that
7 occurred at Plaintiff's home, placing Plaintiff in a false light. The False
8 Statements omit substantial facts and portray Plaintiff in a false light.

9
10 41. The voluminous publications made about Plaintiff would be
11 considered highly offensive to any reasonable person.

12 42. The Defendants had knowledge of the truth and/or acted in reckless
13 disregard as to the falsity of the private False Statements that they published
14 and the false light in which Plaintiff was placed.

15
16 43. To dissuade Defendants from pursuing a similar course of conduct
17 in the future and to discourage other persons from similar conduct in the future,
18 an award of punitive damages should be awarded against Defendants in the
19 sum of sufficient magnitude to punish Defendants and to deter similar conduct
20 by others.

21
22
23 **WHEREFORE,** Plaintiff demands judgment against Defendants as
24 follows:

- 25
26 A. For a preliminary and permanent injunction compelling
27 Defendants to remove from the Internet all material pertaining
28 to Plaintiff;

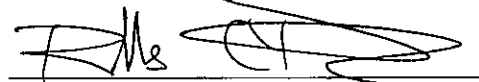
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Scottsdale, Arizona 85258
Telephone: (480) 331-9397

- 1 B. For a preliminary and permanent injunction enjoining
2 Defendants from publishing any false statements or defamatory
3 material to any third party about or pertaining to Plaintiff;
4
5 C. For general damages in an amount to be proven at trial;
6
7 D. For special damages in an amount to be proven at trial;
8
9 E. For punitive damages in an amount to be proven at trial;
10
11 F. For Plaintiff's costs herein incurred;
12
13 G. For Plaintiff's reasonable attorneys' fees incurred herein, which
14 are not less than \$5,000.00 in the event of default;
15
16 H. For interest on the foregoing attorneys' fees and court costs at
17 the statutory rate from the date of judgment until paid;
18
19 I. For prejudgment and postjudgment interest on all damages at
20 the highest rate allowed by law from the date of injury until paid
21 in full; and
22
23 J. For such other and further relief as the Court deems just and
24 proper
25

26 RESPECTFULLY SUBMITTED this 18th day of May, 2016.
27

28
KELLY / WARNER, PLLC

By:



Raees Mohamed, Esq.
8283 N. Hayden Road Suite 229
Scottsdale, Arizona 85258
Attorneys for Plaintiff

EXHIBIT A

EXHIBIT A

LINKS TO REMOVE FROM SEARCH RE: "MEGAN WELTER":

1. <http://abcnews.go.com/US/iraq-war-vet-turned-nfl-cheerleader-arrested-allegedly/story?id=19861885>
2. <http://www.abc15.com/news/region-northeast-valley/scottsdale/cardinals-cheerleader-arrested-after-fight-with-boyfriend>
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5. http://insider.foxnews.com/sites/insider.foxnews.com/files/styles/780/public/080213_cheerleader_234_0.jpg?itok=mh2g7zoT
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11. <http://www.nydailynews.com/news/crime/arizona-cardinals-cheerleader-beat-boyfriend-victim-article-1.1415958>
12. <http://www.newsmax.com/TheWire/megan-welter-cheerleader-arrested-assault/2013/08/05/id/518697/>
13. <http://www.foxsports.com/nfl/story/arizona-cardinals-cheerleader-megan-welter-iraq-vet-charged-with-alleged-assault-080213>

14. <http://uproxx.com/sports/please-forget-all-the-nice-stuff-we-said-about-megan-welter-the-iraq-vet-cheerleader/>
15. <http://www.ibtimes.com/video-arizona-cardinals-cheerleader-megan-welter-beats-boyfriend-iraq-veteran-arrested-assault>
16. <http://www.dailymail.co.uk/news/article-2383667/Arizona-Cardinals-cheerleader-Iraq-war-vet-arrested-beating-boyfriend-flirty-text-sent-girlfriend.html>
17. <http://nesn.com/2013/07/arizona-cardinals-megan-welter-goes-from-army-lieutenant-fighting-in-iraq-to-nfl-cheerleader-video/>
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35. <http://www.rightentertainment.com/?p=11846>
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64. http://www.upi.com/Top_News/US/2013/08/02/Vet-turned-football-cheerleader-charged-with-assault-on-boyfriend/12151375480109/
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67. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>
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73. <http://www.dreamindemon.com/community/threads/iraqi-war-vet-turned-nfl-cheerleader-arrested-for-beating-up-her-boyfriend.63859/>
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85. <http://www.singsupplies.com/showthread.php?158772-Army-veteran-turned-cheerleader-accused-of-assault>
86. <https://www.avvo.com/legal-guides/ugc/arizona-cardinals-cheerleader-arrested-for-disorderly-conduct-criminal-damage--assault>
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88. <http://theinterrobang.com/arizona-cardinals-cheerleader-charged-with-alleged-assault/>
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90. <http://www.mixedmartialarts.com/forums/OtherGround/Cardinals-cheerleader-biotch-charged-wit-assault:2208866-1>
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94. <http://datab.us/8ErIQ15p8j4#Cardinals%27%20cheerleader%20arrested%20after%20fight>
95. <http://gamedayr.com/sports/video-arizona-cardinals-cheerleader-megan-welter-iraq-army-assault/>
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97. <http://insider.foxnews.com/2014/03/10/cardinals-cheerleader-and-former-soldier-megan-welter-charged-assaulting-boyfriend>
98. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>

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7. <https://www.youtube.com/watch?v=1avzEb8OPrQ>
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8 Fax: 1-866-961-4984
9 *Attorneys for Plaintiff*

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
11 **IN AND FOR THE COUNTY OF MARICOPA**

12 MEGAN WELTER an individual;

NO. CV2016-004734

13 Plaintiff,

14 v.

**STIPULATION FOR DISMISSAL
WITHOUT PREJUDICE**

15 JOHN and JANE DOES 1-10 are fictitious
16 persons who may have an interest herein.
17 ABC PARTNERSHIPS 1-10; XYZ
18 CORPORATIONS 1-10; and DEF
19 LIMITED LIABILITY COMPANIES 1-10,
20 Defendants.

21 Plaintiff and Defendant Ryan McMahon (“Defendant”) hereby stipulate to the
22 dismissal, without prejudice, of all claims/counterclaims pled or that could have been
23 pled in the above-captioned matter, with the parties to bear their own attorneys’ fees,
24 costs, and expenses incurred in the above-captioned matter.

25 Defendant agrees to the entry of the Stipulated Order for Permanent Injunction,
26 attached to Exhibit “A” hereto.

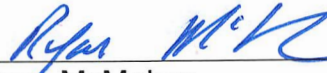
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DATED: May 19, 2016.

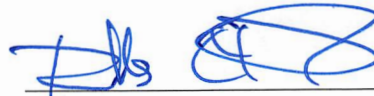


Ryan McMahon
c/o 8283 N. Hayden Road, #229
Scottsdale, AZ 85258
Pro Per Defendant

DATED: May 19, 2016.

KELLY / WARNER, PLLC

By:



Raees Mohamed, Esq.
KELLY / WARNER, PLLC
8283 N. Hayden Rd., Suite 229
Scottsdale, Arizona 85258
Attorney for Plaintiff

Kelly / Warner, PLLC.
8283 N. Hayden Road, Suite 229
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**APPROVED AS TO
FORM AND CONTENT**



Ryan McMahon

Dated: 5/19/2016

c/o 8283 N. Hayden Road, #229
Scottsdale, AZ 85258



Megan Welter

Dated: 5/20/2016

KELLY / WARNER, PLLC

/s/ Raeesabbas Mohamed
Raeesabbas Mohamed, Esq.
8283 N. Hayden Rd., Suite 229
Scottsdale, Arizona 85258
Attorney for Plaintiff

COPY of the foregoing filed
electronically on this same date with
the Clerk of the Superior Court.

COPY of the foregoing
mailed on this same date to:

Ryan McMahon


c/o 8283 N. Hayden Road, #229
Scottsdale, AZ 85258

/s/ Anne E. Griffith
Anne E. Griffith

EXHIBIT A

Kelly / Warner, PLLC.
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Telephone: (480) 331-9397

KELLY / WARNER, PLLC
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Email: Raees@kellywarnerlaw.com (AZ Bar #027418)
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Attorneys for Plaintiffs

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

MEGAN WELTER an individual;

Plaintiff,

v.

JOHN and JANE DOES 1-10 are fictitious
persons who may have an interest herein.
ABC PARTNERSHIPS 1-10; XYZ
CORPORATIONS 1-10; and DEF
LIMITED LIABILITY COMPANIES 1-10,

Defendants.

NO.

**[PROPOSED] STIPULATED
ORDER FOR PERMANENT
INJUNCTION**

Pursuant to stipulation of the Parties, and good cause appearing therefore, IT IS
ORDERED, ADJUDGED AND DECREED that:

1. Plaintiff is awarded a permanent injunction against enjoining Defendant
Ryan McMahon, from publishing false and defamatory statements concerning Plaintiff,
and enjoining Plaintiff from publishing false and defamatory statements concerning
Defendant Ryan McMahon, and compelling removal of the uniform resource locators
("URLs") in **Exhibit A**, attached hereto.

2. Defendant and/or Defendant's Agents, affiliates, and/or other
person/entity assisting or enabling Defendant's publication of the below-referenced
Content (collectively "Defendant's Agents"), shall immediately remove from all

1 websites, search engines, forums, blogs, lists, social media sites, and/or other forums
2 of mass communication (collectively "Forums"), all negative statements, material,
3 and/or information pertaining to Plaintiff and/or any agent/affiliate thereof (the
4 "Content"), including, but not limited to, the Content located at the following URLs,
5 attached as **Exhibit A**, and/or any variations thereof, as well as any search terms
6 and/or URLs that are related, directly or indirectly, or would be reasonably calculated
7 to lead, to the Content or any of the URLs.
8

9 3. Defendant admits that all or substantially all of the statements made in
10 the URLs are false and defamatory.

11 4. Defendant and/or Defendant's Agents shall immediately remove from all
12 Forums any and all Content, references to the Content, partial references to the
13 Content, and/or references to partial Content, including, but not limited to, indexing
14 URLs, index pages, subpages, inner pages, headers, headings, title tags, H1 tags,
15 meta tags, deep links, navigation menus, footers, filenames, ALT text parameters,
16 structured data, semantic data, images, PDFs, slideshows, multimedia files, and
17 search suggestions;
18

19 5. As it is foreseeable that the above-referenced URLs and/or Content will
20 be referenced on additional webpages in the future (as a result of indexing, re-
21 indexing, directory development, search result pages, etc.), Defendant and/or
22 Defendant's Agents shall immediately take all actions, **including requesting removal**
23 **of the URLs from all Internet search engines, including, but not limited to,**
24 **Google, Yahoo!, and Bing, to remove all such webpages and cache from the**
25 **Internet, such that the Content is rendered unsearchable;**
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6. To the extent Defendant and/or Defendant's Agents are unable to remove any Content from any Forum, Defendant and/or Defendant's Agents shall immediately take all reasonable actions requested by Plaintiffs to assist Plaintiffs in removing such Content and/or having the Content rendered unsearchable;

7. The Parties and their Agents shall not post any Content, defamatory or negative material or information about each other and/or any agent/affiliate thereof on any Forum;

8. The Parties and their Agents shall not publish (orally in writing) any Content, defamatory or negative material or information about Plaintiffs and/or any agent/affiliate thereof to any third party; and

9. All Parties shall be deemed to have appeared and waive all objections to jurisdiction. The Court shall retain jurisdiction to the extent it is necessary to amend this order.

DATED this _____ day of _____, 2016.

The Honorable _____, Judge
Maricopa County Superior Court

Kelly / Warner, PLLC.
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Scottsdale, Arizona 85258
Telephone: (480) 331-9397

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**APPROVED AS TO
FORM AND CONTENT**

Ryan McMahon

Dated: __/__/____

Megan Welter

Dated: __/__/____

KELLY / WARNER, PLLC

Raeesabbas Mohamed, Esq.
8283 N. Hayden Rd., Suite 229
Scottsdale, Arizona 85258
Attorney for Plaintiff

COPY of the foregoing filed
electronically on this same date with
the Clerk of the Superior Court.

COPY of the foregoing
mailed on this same date to:

Ryan McMahon

Anne E. Griffith

EXHIBIT A

LINKS TO REMOVE FROM SEARCH RE: "MEGAN WELTER":

1. <http://abcnews.go.com/US/iraq-war-vet-turned-nfl-cheerleader-arrested-allegedly/story?id=19861885>
2. <http://www.abc15.com/news/region-northeast-valley/scottsdale/cardinals-cheerleader-arrested-after-fight-with-boyfriend>
3. http://media2.abc15.com//photo/2013/08/01/Megan_Welter_20130801155754_320_240.JPG
4. http://i.dailymail.co.uk/i/pix/2013/08/02/article-2383667-1B1E732F000005DC-959_1024x615_large.jpg
5. http://insider.foxnews.com/sites/insider.foxnews.com/files/styles/780/public/080213_cheerleader_234_0.jpg?itok=mh2g7zoT
6. <http://heavy.com/entertainment/2013/08/megan-welter-cheerleader-iraq-vet-arrested/>
7. <https://www.google.com/imgres?imgurl=http%3A%2F%2Fheavyeditorial.files.wordpress.com%2F2013%2F08%2Fmegan2.jpeg%3Fquality%3D65%26strip%3Dall%26w%3D780&imgrefurl=http%3A%2F%2Fheavy.com%2Fentertainment%2F2013%2F08%2Fmegan-welter-cheerleader-iraq-vet-arrested%2F&docid=JSczbzJYLcOgcM&tbnid=7ssiqXjzjVg4yM%3A&w=480&h=600&bih=726&biw=1099&ved=0ahUKEwi7ns7cweLMAhUC1WMKHQ6PB9cQMwhaKB4wHg&iact=mrc&uact=8>
8. <http://heavyeditorial.files.wordpress.com/2013/08/cheerleader.gif?w=780>
9. <http://www.abc15.com/news/region-northeast-valley/scottsdale/scottsdale-police-release-video-of-arizona-cardinals-cheerleader-megan-welter-moments-before-arrest>
10. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
11. <http://www.nydailynews.com/news/crime/arizona-cardinals-cheerleader-beat-boyfriend-victim-article-1.1415958>
12. <http://www.newsmax.com/TheWire/megan-welter-cheerleader-arrested-assault/2013/08/05/id/518697/>
13. <http://www.foxsports.com/nfl/story/arizona-cardinals-cheerleader-megan-welter-iraq-vet-charged-with-alleged-assault-080213>

14. <http://uproxx.com/sports/please-forget-all-the-nice-stuff-we-said-about-megan-welter-the-iraq-vet-cheerleader/>
15. <http://www.ibtimes.com/video-arizona-cardinals-cheerleader-megan-welter-beats-boyfriend-iraq-veteran-arrested-assault>
16. <http://www.dailymail.co.uk/news/article-2383667/Arizona-Cardinals-cheerleader-Iraq-war-vet-arrested-beating-boyfriend-flirty-text-sent-girlfriend.html>
17. <http://nesn.com/2013/07/arizona-cardinals-megan-welter-goes-from-army-lieutenant-fighting-in-iraq-to-nfl-cheerleader-video/>
18. <http://www.georgianewspday.com/news/national/166994-arizona-cardinals-cheerleader-and-iraq-war-vet-megan-welter-arrested-for-beating-boyfriend-over-flirty-text.html>
19. https://www.reddit.com/r/arizona/comments/2h4f4e/arizona_cardinals_cheerleader_and_iraq_war_vet/
20. https://www.reddit.com/r/MensRights/comments/2h1mxc/nfl_cheerleader_assaults_boyfriend_then_calls/
21. <http://hollywoodlife.com/2013/08/02/megan-welter-arrested-cheerleader-assault-boyfriend-arizona-cardinals/>
22. <http://www.cbsnews.com/news/megan-welter-arizona-cardinals-cheerleader-and-iraq-war-veteran-accused-of-assaulting-her-boyfriend/>
23. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>
24. <http://bustedcoverage.com/2013/08/02/megan-welter-cardinals-cheerleader-iraq-war-vet-arrested/>
25. <http://zap2it.com/2013/07/megan-welter-meet-the-iraq-war-veteran-turned-arizona-cardinals-cheerleader/>
26. <http://www.rightthisminute.com/video/megan-welter-marine-az-cardinals-cheerleader-arrested-assault-police-call>
27. <http://www.rightthisminute.com/video/megan-welter-arizona-cardinals-cheerleader-arrested-assault-fight>
28. <https://www.pinterest.com/pin/188377196886664961/>

29. <https://www.rooshvforum.com/thread-40599.html>
30. <http://www.cbs5az.com/story/23023496/noted-az-cardinals-cheerleader-faces-assault-charges>
31. <http://fabwags.com/megan-welter-arizona-cardinals-cheerleader-army-vet-arrested-for-assaulting-boyfriend/>
32. <http://tireball.com/nfl/2013/08/02/iraq-vet-turned-cheerleader-megan-welter-arrested-for-assault/>
33. <http://www.examiner.com/article/cheerleader-megan-welter-s-drunken-attack-on-boyfriend-caught-on-tape>
34. <http://www.phoenixnewtimes.com/news/arizona-cardinals-cheerleader-arrested-for-allegedly-assaulting-boyfriend-6659503>
35. <http://www.rightentertainment.com/?p=11846>
36. <https://aikenareaprogressive.wordpress.com/2013/08/05/arizona-cardinals-cheerleader-megan-welter-charged-with-domestic-violence-for-beating-up-boyfriend/>
37. <http://ftw.usatoday.com/2013/08/war-veteran-nfl-cheerleader-arrested-on-domestic-violence-charges>
38. <http://www.metatube.com/en/videos/196112/The-Cheerleader-Megan-Welter-beating-her-boyfriend/>
39. <http://www.ecanadanow.com/megan-welter-cheerleader-charged-with-alleged-assault/68467/>
40. <http://profootballtalk.nbcsports.com/2013/08/03/cardinals-cheerleader-arrested-after-fight-with-boyfriend/>
41. <http://www.hngn.com/articles/9263/20130802/arizona-cardinals-cheerleader-nfl-iraq-war-veteran-beating-boyfriend.htm>
42. <http://radaronline.com/exclusives/2013/08/arizona-cardinals-cheerleader-accused-of-beating-up-on-pro-fighter-boyfriend/>
43. <http://www.barstoolsports.com/dont-use/arizona-cardinals-cheerleader-was-beaten-up-by-her-boyfriend-until-video-showed-him-cowering-as-she-went-bat-shit-crazy/>

44. <http://sports.yahoo.com/blogs/nfl-shutdown-corner/arizona-cardinals-cheerleader-iraq-war-vet-arrested-domestic-192722568.html>
45. <http://www.mensrightsofarizona.com/false-911-dv-calls.html>
46. <http://www.urbanentertainmentnews.com/2013/08/wtf-arizona-cardinals-cheerleaderarmy.html>
47. <http://www.azcentral.com/community/scottsdale/articles/20130801cards-cheerleader-accused-assaulting-her-boyfriend.html>
48. <http://www.yellowbullet.com/forum/showthread.php?t=598464>
49. <http://theuniversityofleft.tumblr.com/>
50. <http://www.businessinsider.com.au/nfl-cheerleader-fights-boyfriend-in-alleged-video-2013-8>
51. <http://mstarsnews.musictimes.com/articles/17436/20130803/megan-welter-arizona-cardinals-cheerleader-charged-with-assault-cell-phone-police-video-watch-911-call-iraq-war-veteran-beat-boyfriend-ryan-mcmahon.htm>
52. <http://abcnews.go.com/US/iraq-war-vet-turned-nfl-cheerleader-arrested-allegedly/story?id=19861885>
53. <http://www.ibtimes.com/video-arizona-cardinals-cheerleader-megan-welter-beats-boyfriend-iraq-veteran-arrested-assault>
54. <http://www.theblaze.com/stories/2013/08/02/nfl-cheerleader-who-served-in-iraq-arrested-for-assault-see-the-police-video/>
55. <http://www.sportsgrid.com/nfl/arizona-cardinals-cheerleader-who-is-also-iraq-war-vet-arrested-for-assaulting-boyfriend/>
56. <http://uproxx.com/sports/please-forget-all-the-nice-stuff-we-said-about-megan-welter-the-iraq-vet-cheerleader/>
57. <http://nypost.com/2013/08/02/beautiful-nfl-cheerleader-and-army-veteran-arrested-for-allegedly-assaulting-boyfriend/>
58. <http://sports.yahoo.com/blogs/nfl-shutdown-corner/arizona-cardinals-cheerleader-iraq-war-vet-arrested-domestic-192722568.html>
59. http://www.liveleak.com/view?i=732_1377746787

60. <https://www.pinterest.com/pin/372954412862396655/>
61. <http://www.staradvertiser.com/sports/arizona-cardinals-cheerleader-accused-of-assault/>
62. <http://legacy.wtsp.com/story/news/weird/2014/03/12/2031442/>
63. <http://www.torontosun.com/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
64. http://www.upi.com/Top_News/US/2013/08/02/Vet-turned-football-cheerleader-charged-with-assault-on-boyfriend/12151375480109/
65. <http://www.wellandtribune.ca/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
66. <http://www.barstoolsports.com/dont-use/arizona-cardinals-cheerleader-was-beaten-up-by-her-boyfriend-until-video-showed-him-cowering-as-she-went-bat-shit-crazy/>
67. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>
68. <http://www.theobserver.ca/2013/08/02/arizona-cardinals-cheerleader-iraq-war-veteran-arrested-for-assault>
69. <http://legacy.king5.com/story/news/local/2014/08/04/13284972/>
70. <http://www.si.com/extra-mustard/2013/08/02/iraq-veteran-and-cardinals-cheerleader-arrested-for-allegedly-assaulting-her-boyfriend>
71. <http://www.azfamily.com/story/28370601/celebrated-cardinals-cheerleader-arrested-after-alleged-assault-caught-on-video>
72. <http://www.imdb.com/name/nm3928925/news>
73. <http://www.dreamindemon.com/community/threads/iraqi-war-vet-turned-nfl-cheerleader-arrested-for-beating-up-her-boyfriend.63859/>
74. <http://abcnewsradioonline.com/national-news/ariz-cardinals-cheerleader-arrested-for-allegedly-attacking.html>
75. <http://tlicnaptown.hellobeautiful.com/2138776/cardinals-cheerleader-beat-up-her-boyfriend-then-called-police-but-he-had-it-on-video-and-shes-in-trouble/>

76. <http://uinterview.com/news/megan-welter-iraq-vet-turned-nfl-cheerleader-was-arrested-for-alleged-assault/>
77. <http://mstarsnews.musictimes.com/articles/17436/20130803/megan-welter-arizona-cardinals-cheerleader-charged-with-assault-cell-phone-police-video-watch-911-call-iraq-war-veteran-beat-boyfriend-ryan-mcmahon.htm>
78. <http://www.sammyboy.com/showthread.php?158772-Army-veteran-turned-cheerleader-accused-of-assault>
79. <https://twitter.com/nflrt/status/363395141223972864>
80. <http://ihatelupica.blogspot.com/2013/08/cardinals-cheerleader-and-iraq-war-vet.html>
81. http://www.truecrimereport.com/2013/08/arizona_cardinals_cheerleader.php
82. <http://www.ebaumsworld.com/videos/lying-cheerleader-calls-cops-for-domestic-abuse-but-boyfriend-proves-she-was-the-attacker/84505096/>
83. http://tucson.com/news/state-and-regional/nfl-cheerleader-charged-in-boyfriend-s-assault-and-other-state/article_4a73022b-e3b8-5583-a838-6677cda69c8f.html
84. <http://blackandgold.com/nfl/59283-cardinals-cheerleader-arrested-after-fight-boyfriend.html>
85. <http://www.singsupplies.com/showthread.php?158772-Army-veteran-turned-cheerleader-accused-of-assault>
86. <https://www.avvo.com/legal-guides/ugc/arizona-cardinals-cheerleader-arrested-for-disorderly-conduct-criminal-damage--assault>
87. <http://ftw.usatoday.com/2013/08/war-veteran-nfl-cheerleader-arrested-on-domestic-violence-charges>
88. <http://theinterrobang.com/arizona-cardinals-cheerleader-charged-with-alleged-assault/>
89. <http://tireball.com/nfl/2013/08/02/iraq-vet-turned-cheerleader-megan-welter-arrested-for-assault/>

90. <http://www.mixedmartialarts.com/forums/OtherGround/Cardinals-cheerleader-biotch-charged-wit-assault:2208866-1>
91. <http://www.urbanentertainmentnews.com/2013/08/wtf-arizona-cardinals-cheerleaderarmy.html>
92. <http://www.mensrightsofarizona.com/false-911-dv-calls.html>
93. <http://rbpattersonjr.tumblr.com/post/66920910501/on-this-veterans-day-week-arizona-cardinals>
94. <http://datab.us/8ErIQ15p8j4#Cardinals%27%20cheerleader%20arrested%20after%20fight>
95. <http://gamedayr.com/sports/video-arizona-cardinals-cheerleader-megan-welter-iraq-army-assault/>
96. <http://www.cbs5az.com/story/23023496/noted-az-cardinals-cheerleader-faces-assault-charges>
97. <http://insider.foxnews.com/2014/03/10/cardinals-cheerleader-and-former-soldier-megan-welter-charged-assaulting-boyfriend>
98. <http://www.inquisitr.com/884473/cheerleader-megan-welter-arrested-for-assault-video/>

YOUTUBE VIDEOS:

1. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
2. <https://www.youtube.com/watch?v=YWjYHoB7xnU>
3. <https://www.youtube.com/watch?v=ycaQHTwLBC0>
4. <https://www.youtube.com/watch?v=ccE3B778FZ0>
5. <https://www.youtube.com/watch?v=Wp7Aasz7kmw>
6. <https://www.youtube.com/watch?v=2za6nDSBfAg>
7. <https://www.youtube.com/watch?v=1avzEb8OPrQ>
8. <https://www.youtube.com/watch?v=61lx5hudS58>
9. <https://www.youtube.com/watch?v=8ErIQ15p8j4>

SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

CV 2016-004734

06/29/2016

HONORABLE PATRICIA ANN STARR

CLERK OF THE COURT
T. DeRaddo
Deputy

MEGAN WELTER

RAEESABBAS MOHAMED

v.

JOHN DOE

JOHN DOE
NO ADDRESS ON RECORD

DISMISSAL CALENDAR

East Court Building - Courtroom 412

3:03 p.m. This is the time set for a Telephonic Status Conference regarding the parties' Stipulated Order for Permanent Injunction. Appearing on behalf of Plaintiff is counsel, Raeesabas Mohamed. The Defendant, Ryan C. McMahon appears on his own behalf (a/k/a John Doe).

A record of the proceedings is made digitally in lieu of a court reporter.

Discussion is held regarding the Stipulation between the parties.

IT IS ORDERED approving/granting the Stipulation, all in accordance with the formal written Order signed by the Court on June 29, 2016 and entered (filed) by the clerk on June 29, 2016.

IT IS FURTHER ORDERED placing this matter on the Dismissal Calendar for dismissal on August 29, 2016 without further notice unless prior to said date Judgment is entered or filed or a Stipulation for Dismissal is presented.

3:09 p.m. Matter concludes.