



IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA

BRITTNEY WILK, LISA THOMPSON, )  
CHRISTINA CARNES, AMANDA )  
MARKHAM JOHNSON, )  
KARA INGRAM, JASMINE LAWSON )  
and ANGIE INGRAM, )

Plaintiffs, )

vs. )

CASE NO.: CV-2016-000161.00

CATHY MOON aka CATHY S. )  
HOFFMAN, KAREN PEARSALL )  
ORANGE, HEATHER HALLDIN, )  
LIZ MOE aka ELIZABETH M. DICKENS, )  
NANCY ANN FRIEDMAN, LISA )  
SWABODA, BETH REED, and the person )  
who is unknown to the Petitioners )  
at this time but will be supplemented later )  
in his/her individual capacity as an )  
Administrator of and contributor )  
to "BEWARE CAVALIER RESCUDE OF )  
ALABAMA", a Facebook group, et al. )

Defendants. )

**NOTICE OF SERVICE OF DISCOVERY**

Plaintiffs hereby give notice that they have served the following discovery documents on all parties in this matter:

- 1. Plaintiffs' Supplemental Responses to Defendant Orange's First Interrogatories.

/s/ Amanda S. Williamson  
KATHRYN S. HARRINGTON (SUM002)  
AMANDA S. WILLIAMSON (WIL398)

Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2017 I filed a copy of the foregoing with the Clerk of the Court using the AlaFile system which will notify the following counsel of record via e-mail:

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/s/ Amanda S. Williamson  
AMANDA S. WILLIAMSON

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DICKENS; ET AL, )

Defendants. )

PLAINTIFFS FIRST SUPPLEMENTAL RESPONSE TO DEFENDANT KAREN PEARSALL ORANGE'S FIRST INTERROGATORIES

COMENOW, Plaintiffs, and supplement responses to Defendant Karen Pearsall Orange's First Interrogatories as follows:

SUPPLEMENTAL INTERROGATORY RESPONSES

3. Have you ever been treated for drug or alcohol abuse? If so, when you were treated for drug or alcohol abuse and state the name of the hospital or doctor providing such treatment.

ANSWER: Plaintiffs reiterate their objection to this interrogatory as it is irrelevant to any claim or defense, it seeks private information, it seeks information that is neither relevant nor material and it is not reasonably limited in time or scope.

4. Have you ever been treated for a mental illness and if so, the nature of the mental illness and where and when you were treated for said illness.

ANSWER: Plaintiffs reiterate their objection to this interrogatory as it is irrelevant to any claim or defense, it seeks private information, it seeks information that is neither relevant nor material and it is not reasonably limited in time or scope.

9. State the balance of the GoFundMe account (1) immediately prior to the auction referenced [*inter alia*] in Paragraph 17 of Plaintiffs' Amended Complaint, (2) at the conclusion of the auction, and (3) presently.

**ANSWER:** We produced a spreadsheet documenting all of the GoFundMe donations and the date each donation was made. See WILK433. While we can account for the funds donated to the GoFundMe campaign, we do not know the *exact* balance of the GoFundMe account *immediately* prior to the auction referenced in Paragraph 17 of Plaintiffs' Amended Complaint nor at the moment the auction concluded. It is difficult to ascertain the balance of the GoFundMe account *immediately* prior to the auction as the donations were coming in quickly and continuously. Likewise, it is difficult to ascertain the exact balance of the Go Fund Me account at the immediate conclusion of the auction. Angie Ingram paid for all of the dogs at the auction with her personal funds and was reimbursed by Britney Wilk with the funds received through the GoFundMe campaign. Some funds received through the GoFundMe campaign were transferred to Angie Ingram after the auction to reimburse her. As Plaintiffs' First Response to this Interrogatory stated the present balance of the GoFundMe account is \$0.00.

11. State all amounts expended from the GoFundMe website, the date of said expenditure, and identify the recipient of each such expenditure.

**ANSWER:** When money was donated to the GoFundMe campaign it went into the GoFundMe account. Money from the GoFundMe account was transferred to Brittney Wilk's PayPal account or bank account. Expenditures for Brittney's accounts were as follows:

Date	Amount	Recipient
11/22/2014	\$ 9,500.00	Angie Ingram
11/22/2014	\$ 2,000.00	Angie Ingram
11/22/2014	\$ 2,000.00	Angie Ingram
11/22/2014	\$ 10,000.00	Angie Ingram
11/24/2014	\$ 4,000.00	Lisa Thompson
11/28/2014	\$ 126,055.00	Angie Ingram
11/28/2014	\$ 500.00	AAAS
11/28/2014	\$ 4,400.00	Lisa Thompson
11/30/2014	\$ 11,534.00	Cavalier Rescue USA
12/1/2014	\$ 85.00	Amanda Markham
12/3/2014	\$ 35.00	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/3/2014	\$ 17.50	Akc Reunite
12/4/2014	\$ 70.00	Akc Reunite
12/4/2014	\$ 70.00	Akc Reunite
12/4/2014	\$ 70.00	Akc Reunite
12/4/2014	\$ 70.00	Akc Reunite
12/4/2014	\$ 70.00	Akc Reunite
12/4/2014	\$ 52.50	Akc Reunite
12/4/2014	\$ 52.50	Akc Reunite

12/4/2014	\$ 52.50	Akc Reunite
12/4/2014	\$ 52.50	Akc Reunite
12/4/2014	\$ 52.50	Akc Reunite
12/4/2014	\$ 35.00	Akc Reunite
12/4/2014	\$ 19.95	Avid Pettrac
12/4/2014	\$ 17.50	Akc Reunite
12/4/2014	\$ 17.50	Akc Reunite
12/12/2014	\$ 1,588.00	Cavalier Rescue USA
12/16/2014	\$ 364.00	Angie Ingram
12/21/2014	\$ 87.00	Cavalier Rescue USA
1/20/2015	\$ 204.98	Lisa Thompson
3/21/2015	\$ 205.00	Jasmine Lawson
6/5/2015	\$ 215.00	Ernest Redwine
Per donation, GoFundMe charged fees at the time of the donation	\$ 9,439.50 total	Go Fund Me
Per transaction, PayPal charged fees at the time of transaction	\$ 6,162.50 total	PayPal

12. Identify each animal purchased at the auction, and the amount paid for each such animal.

**ANSWER:**

Dog Item Number	Price
3	2,900.00
4	2,900.00
5	2,900.00
6	2,900.00
7	2,900.00
8	2,800.00
9	2,800.00
10	2,800.00
11	2,800.00
12	2,800.00
13	4,500.00
14	4,500.00
15	4,500.00
16	4,500.00
17	4,500.00
18	6,200.00
19	6,200.00
20	6,200.00
21	6,200.00
22	6,200.00
23	3,250.00

24	3,250.00
25	3,250.00
26	3,250.00
27	3,250.00
28	3,700.00
29	3,700.00
30	3,700.00
31	3,700.00
32	3,700.00
34	3,600.00
35	3,600.00
44	3,750.00
57	3,850.00
58	3,850.00
61	3,600.00
62	3,600.00
63	3,600.00
87	3,250.00
95	4,300.00
96	4,300.00
97	4,300.00
98	4,300.00
99	4,300.00
	170,950.00
Buyer's Premium	17,095.00
Invoice Total	<b>188,045.00</b>
Additional Charge by auction house for Brucellosis test	<b>880.00</b>

Additionally, Angie purchased dogs Victor, no. 86, and Shiloh, no. 65, following the close of the auction. These two dogs were purchased together for a total price of **\$24,200.00**, inclusive of the buyer's premium. Angie also purchased a French bulldog and 7 puppies together for a total purchase price of **\$5,200.00**.

Angie Ingram wrote four checks to Southwest Auction on November 22, 2014 for the purchase of these dogs in the following amounts: \$188,045.00, \$880.00, \$5,200.00 and \$24,200.00.

15. For each animal identified in Paragraph 19 of Plaintiffs' Amended Complaint, state and/or identify the chain of custody of said animal from the date they were purchased at auction until the present. Include in your response the name and contact information for every individual or entity in the chain, and the amount of consideration, if any, paid by said individual or entity for said animal.

**ANSWER:** The animals identified in Paragraph 19 of Plaintiffs' Amended Complaint were purchased by and taken into custody of Angie Ingram at the auction. These animals are identified

as follows:

<b>Dog Item Number</b>
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86

Twelve of these dogs, identified by numbers 21, 22, 23, 25, 31, 32, 58, 57, 28, 29, 34 and 13, were transferred to Cavalier Rescue USA at the auction and taken to various states including Michigan, Indiana, Missouri and Oklahoma by the state coordinators of Cavalier Rescue USA. We do not know the custody of these dogs further than that.

The remaining thirty-four dogs were transported from the auction to Birmingham, Alabama by The Greater Birmingham Humane Society. Once in Birmingham these dogs were seen by a veterinarian and transferred to Cavalier Rescue USA to be placed in foster homes and then be permanently adopted. Those foster homes are identified on document WILK26 in Column B. WILK26 also clearly identifies each dog by number, name and registration number, if applicable. We do not know who currently has custody of all of these dogs. Specific adoption details and agreements are the property of Cavalier Rescue USA and we do not have access to those records.

We do know Crys Martin (Carnes) took custody of Shiloh, now Parker, no. 65 as a foster home for Cavalier Rescue USA on or about November 23, 2014 through approximately December 19, 2014 when she formally adopted her. She still has custody of her today. She and her husband, Cameron Carnes, paid a \$300 adoption fee to Cavalier Rescue USA.

Jasmine Lawson took custody of Jude, now Haven, no. 14, as a foster home for Cavalier Rescue USA on or about November 23, 2014 and then formally adopted her on or about January 20, 2015 and still has her today. She paid a \$300 adoption fee to Cavalier Rescue USA.

Lisa Thompson had custody, as a foster home for Cavalier Rescue USA, of Cherry Oh Baby, no. 7, from on or about 11/22/14 through 12/5/2014 when Cherry Oh Baby was transferred to the GA team for CRUSA. We do not know her adoption details. Lisa Thompson had custody, as a foster home for Cavalier Rescue USA, of Flica, no. 6, from on or about 12/5/2014 through 12/20/2014. Flica was then adopted by the Baumann Family of Odenville, Alabama.

Amanda Johnson took custody of Gideon, no. 96, on or about November 23, 2014 and he remains in her custody today. Amanda first took custody as a foster home for Cavalier Rescue USA and then adopted Gideon from Angie Ingram on or about December 30, 2014. Gideon has stayed in Amanda's custody from approximately November 22, 2014- present. Amanda Johnson is the owner and custodian of Gideon today.

Brittney Wilk took custody of Happy Go Lucky, no. 44, as a foster home for Cavalier Rescue USA on or about November 23, 2014. Brittney adopted Happy Go Lucky on or about December 18, 2014 and still has custody today. She paid a \$300 adoption fee to Cavalier Rescue USA.



Robin Harper took custody of Royal Victor as a foster home for Cavalier Rescue USA on or about November 22, 2014. Angie Ingram took custody of Royal Victor, no.86, from Cavalier Rescue USA on or about December 16, 2014 when she adopted him and still has custody today. She paid a \$300 adoption fee to Cavalier Rescue USA.

16. Did you personally contribute any amount of money to the GoFundMe website? If so, state the amount and date of the contribution.

**ANSWER:**

Brittney Wilk- No.

Lisa Thompson- Yes, approximately \$100 on 11/10/2014.

Christina Carnes- Yes, approximately \$50 on 11/10/2014 and paid for my own travel expenses to the auction.

Amanda Markham Johnson- Yes, approximately \$40 on 11/22/2014.

Kara Ingram- No.

Jasmine Lawson- No.

Angie Ingram- Yes, approximately \$100 on 11/10/2014 and paid for my own travel expenses to the auction.

Professional time was also donated. We do not claim our donated time as a damage of this lawsuit as your January 26, 2017 letter suggests. We donated our time and money for the good of the dogs.

17. Do you presently, or have you at any point, had custody of any animal purchased at the auction? If yes, how much if any consideration did you pay for the animal? If you have subsequently sold the animal, state the amount of compensation you received.

**ANSWER:** Amanda Johnson has custody of Gideon. Amanda Johnson adopted Gideon and did not purchase him for consideration. Brittney Wilk has custody of Happy Go Lucky. She paid a \$300 adoption fee to Cavalier Rescue USA. Brittney Wilk had custody of many animals purchased at the auction in her volunteer position with Cavalier Rescue USA. Brittney does not recall their names. Angie Ingram had custody of all animals in the sense that she purchased them at the auction. Angie Ingram currently has possession of Royal Victor. She paid a \$300 adoption fee to Cavalier Rescue USA. Crys Martin has custody of Shiloh, now Parker. She paid a \$300 adoption fee to Cavalier Rescue USA. Jasmine Lawson has custody of Jude. She paid a \$300 adoption fee to Cavalier Rescue USA. Lisa Thompson had custody of Cherry oh Baby and Flica. She no longer has custody of them as they were placed via the standard adoption process of Cavalier Rescue USA. Kara Ingram has not had custody of any animals purchased at auction.

None of the animals mentioned in the preceding paragraph were subsequently sold by us.

18. Identify each and every "inaccurate and defamatory statement" published by defendants about you. [See Amended Complaint, Paragraph 21]

**ANSWER:** Defendants made inaccurate and defamatory statements about Plaintiffs as a group and individually implying and/or stating that the Plaintiffs are unethical, deceptive, vengeful, criminal and untrustworthy. This posts are ongoing today. Defendant's

repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Orange made several inaccurate and defamatory statements about all Plaintiffs, as a group, implying and at other times outright stating that they committed crimes including fraud, theft, kidnapping and violated the deceptive fair trade act of Alabama. These inaccurate and defamatory statements include the following statements published on Facebook (the Bates number follows the statement when a screen shot of the statement is available, likewise the date precedes the statement when available):

February 15, 2015 at 3:11pm: "Here is a screen shot of original post which has not been deleted. Rescue Frauds." ORANGE238

February 15, 2015 at 2:11pm: "Here is a screen shot of original post which has not been deleted. Rescue Frauds.;" at 2:14pm "Brittney's personal mission to buy and keep one of the auction dogs for herself. Pitiful group of rescue frauds. BEWARE CAVALIER RESCUE OF ALABAMA" ORANGE237

February 15, 2015 at 5:09pm: "As I said crooks and thieves under the guise of rescue" ORANGE0102, ORANGE0233

February 17, 2015: "FOR ALL PEOPLE WHO CONTRIBUTED TO SAVE THE CAVALIERS FROM AUCTION... That photo was taken by the ALABAMA bunch to use to get everyone to think the dogs were kept in a puppy mill. As the facts come out, and they will Lisa Thompson, Angie Ingram, Crys Carnes, Brittney Wilk, and even you BLAKE RHODES. Everyone will know just what you all did." ORANGE0103, ORANGE 0116, ORANGE0190

February 19, 2015: "This is the same group of girls that stole GIDEON from MAGGIE DAWSON. They stole from the rescue they collected the money to rescue the cavaliers from auction. ... Now because they were kicked out of CRUSA they formed their own group and are out to fleecce you out of more donations on their new GoFundMe page." ORANGE0109, ORANGE0113, ORANGE0234

"You girls pulled off quite a scam."

"And slander is lies. We're not lying."

February 3, 2015: "Yes and these Cavalier Rescue of Alabama used donated money to 'save the puppy mill dogs of RCF' bull crap. Does this dog look like a puppy mill dog? No. Don't you people who donated to this retail purchase of dogs feel cheated that the same people who told you all dogs would be turned over to Cavalier Rescue USA and you had a chance to adopt them kept the best dogs for themselves with your money. Explain yourself Brittney Wilk? You are the new owner of this \$10,000 beautiful dog. Aren't you ashamed of yourself and your Birmingham

Alabama Group!" ORANGE0158, ORANGE0169

February 7, 2015: "By the BB' own words. Approx \$220,000 dollars. Approx \$75,000 into Ingram Law Office PayPal account and approx. 189,000 into GoFundMe." ORANGE0009

February 7, 2015: "Fraud." ORANGE0009

February 5, 2015: "All the Cavaliers are added to the Birmingham Cavalier Social Club. They are above the law or so they think." ORANGE0007

February 5, 2015: "I would say none of them had planned to be anything but a foster failure. And it seems no one wants to discuss the facts regarding where the money went and who paid for spay and neuter and dental. Other than that most all dogs were healthy and well adjusted according to the girls that 'fostered' them." ORANGE0008

February 5, 2015: "It wasn't all about the dogs. It was all about getting RCF dogs for themselves. We already know of 14 dogs given to the Birmingham bunch and their family. That's not all about the dogs its nepotism. Pure and simple" ORANGE0005

February 7, 2015: Defendant Orange posted "Here come the true press. Look out BB's your days as what you call rescuers are over" and shared a thread "No good deed goes unpunished or...shady rescue strikes again" from DogForums.com that states "Many of us feel duped. ...I didn't donate money for these ladies and their friends to get free dogs." ORANGE0168

February 8, 2015: "...but they are using the same harassment tactics except these cavaliers are not wanted by the BB group as they are not well bred and well taken care of as were the cavaliers from RCF. Those they coveted." ORANGE 0127

February 12 "You can bet that's just what they did and called it rescue" See ORANGE0121

February 26: "Now let's hope the attorney spear heading this fiasco loses her license."

March 12, 2015 "There is one simple fact and that is you are all spiteful, cruel and self-centered. You kept GIDEON for no apparent reason except to make a name for yourselves and you sure have done that, but not in the way you expected. I hope you never receive a donation to your new rescue from outside your little group and you pay the price for not just admitting you were wrong, hand over GIDEON to MAGGIE and get on with your social lives. You all have what you wanted. What makes you all so damm entitled?"

Hopefully you will think twice about your stupid lawsuits against Terri and just drop them. You are being viewed as pariahs and it will only get worse if you don't just do the right thing." ORANGE0040

"They are not only taunting a 70 year old woman they are also suing one. Me." ORANGE0041

"...The more they pursued their evil the more popular they became in their tiny social group at the expense of others." ORANGE0046, ORANGE0202

"For anyone that would like to write to the Birmingham/Jackson County DA this is the address... You can report to him anything" ORANGE0160

"This was a scam. Terri may have been over her head but you Cavalier girls of Alabama really scammed the cavalier lovers world...I'm ashamed to say You pulled me into your scam. Who got the two dogs you paid \$25,000 apiece of donated money for? ..." ORANGE0161

"...They have violated the deceptive fair trade act of Alabama." ORANGE0172

February 20, 2015: "Don't donate at the cavalier rescue of ALABAMA booth. Never know just where the money will windup." ORANGE0045

"I can't say what I would like for obvious reasons but they should know they have not won. There are corporate lawyers on the case and they aren't dealing with our money. They are suing corporations who don't take this kind of lawsuit lightly. Gideon will be taken from them and we will all prevail." ORANGE0063

"Ditto. They have caused irrefutable harm to the entire breed." ORANGE0070

"And Lisa Thompson and Brittney Wilk stop checking every website to see if someone says something you don't like. Remember your lawsuit?????? Stupid woman" ORANGE0081

"Well I don't think the woman who created this nightmare deserve to start their own rescue 501c. Their motto is to be a proactive rescue so..." ORANGE0084

February 5, 2015: "Again you don't know what you're talking about. The Crazy Cav Ladies promised not to bid against her representatives at the auction and they asked everyone not to bid on Happy Go Lucky for Angie. They went back on their word. They are evil." ORANGE0098

February 5, 2015: "...The Birmingham woman broke their promises, took the law in their hands and seem to think their views are more valid than those of the rescue

they worked for.” ORANGE0098

“...And I’m sure they would like to THANK everyone who donated so that they were able to use YOUR money to buy THEMSELVES dogs. You donated \$10,000 for Lisa Thompson’s Dog, \$10,000 for Crys Carnes Dog, and almost \$4,000 each for all their friends and families dogs....Yes folks they made good use of the hard earned money you donated. If that’s okay with you fine but if you feel outraged as I do demand they pay you back your money. Write to CRUSA and ask them where your money is? DEMAND an accounting of vet bills Did we also pay for the medical bills for BIRMINGHAM CRAZY CAV LADIES DOGS?” ORANGE0105

February 3, 2015: Shared “Beware Cavalier Rescue of Alabama” page ORANGE0106

February 25: “WOULD YOU HAVE DONATED IF YOU KNEW THEY WERE GOING TO BUY DOGS FOR THEMSELVES AND FOR FRIENDS AND FAMILY? That’s what they did with the money you donated. See the details on the BEWARE CAVALIER RESCUE OF ALABAMA FB PAGE” This post had at least 16 shares. ORANGE0194

Posted on [www.dogworld.co.uk](http://www.dogworld.co.uk) on March 4, 2015: “This article is mild considering all the wrong these girls have committed. It’s CRUSA responsibility to sue the girls as stated in Alabama non profit and fraud law that I posted on FB. Now give GIDEON back to MAGGIE.” ORANGE0039, ORANGE0133

Particular to Angie: ORANGE 0090, 0104, 0147

Particular to Jasmine: ORANGE 0092

Particular to Brittney: ORANGE0100, 0174, 0192

Particular to Crys: ORANGE0173, ORANGE0174

To understand the other parts of the conversations or circumstances of Defendant Orange’s publications, please see documents ORANGE0001-0238, Defendant Orange’s entire Facebook history to be produced and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Statements made by Defendant Moon pertaining to all Plaintiffs: Moon5; “Karen, what are you talking about?! CR-USA has nothing to do with this post. The dog was stolen. This does not in any way reflect on CR-USA. The social media pressure will take care of this. Let it be a reflection of who Mandy it, because it already is.” Moon5. Statement made by Defendant Moon particular to Britney: “The other rescues didn’t take Maggie Dawson’s dog Gideon. Brittney Wilk took him and did not return him, which amount to theft.” Moon1. To understand the other parts of

the conversations or circumstances of Defendant Moons publications, please see Defendant Moon's entire Facebook history to be produced and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Halldin made the following statements: "With the exception of Lacelliese King, Mary Louis Guerry-Forec here are some of the perpetrators of the theft of Pomelo Gideon-Brittney Wilk, Angie Hubbard Ingram, Crys Carnes and Kara Ingram."; "I think a great analogy of the different 'breeds' of rescue could be this- one is like a TV televangelist ... and one is the pastor that sits up all night with a parent in the ER waiting room" And then Karen Pearsall Orange replies: "Amen Heather. And we know who the televangelist is." Peggy Kenney replies: "With her hand in your pocket." Hallin13; "...seems to me those who are quick to call others harassers are adept at it..." Halldin19. To understand the other parts of the conversations or circumstances of Defendant Halldin's publications, please see Defendant Halldin's entire Facebook history to be produced and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Moe made the following statements regarding all Plaintiffs:

"Violating established written guidelines and protocols of a rescue you claim to represent is not ok. They were not part of a foster to adopt program." Moe3

"...Gideon was obtained by deception. That is not rescue." Moe4.

"Looks like Gideon was adopted by people who wanted to use him and his situation for 'moral preening', not because they truly wanted a dog." Moe10

"Speaks volume about their character and integrity." Moe11

"You are still being deceived. This is an infographic, not an accounting." Moe12

"And Lisa Swoboda you really shouldn't jump to conclusions it may just be a super cute way of hiding assets." Moe15

"I don't think it is always all about the \$. I believe that some of these people have personality disorders and that is what some of this stems from." Moe31

"Important. Please share. If you are a dog breeder, this could happen to you." Dog World article. Moe32

Shared Maggie Dawson's post and told people to go to Beware Cavalier Rescue of Alabama. Moe34 and 35.

"...They had the rescue pay for all the expenses and then made a nominal donation

to 'adopt' them." Moe36

To understand the other parts of the conversations or circumstances of Defendant Moe's publications, please see documents Moe1-38, Defendant Moe's entire Facebook history to be produced and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Swoboda made the following statements about all plaintiffs:

"You don't get to mislead and treat people the way you all have and get away with it." Swaboda0005

"Your friends agreed to this prior to the auction and they all knew Cheryl..." Swaboda0006

"You all have no credibility. None." Swaboda0007.

"It's amazing how all of these foster failures were friends of the organizers of Cavalier Rescue of Alabama prior to the auction and live it the Birmingham, Alabama area." Swaboda0018

March 4, 2015: "Please share this with every Cavalier owner you know." Swaboda0023

March 4, 2014: "This is very disheartening.  
<http://www.dogworld.co.uk/product.php/132074/>. There is a FB group addressing this situation named Beware Cavalier Rescue of Alabama" Swaboda0024

March 22 at 3:52pm: "Oh yes...and here's another photo of some more of these sick, abused, "pancaked to the ground" dogs they've purchased in the past. This is a few days after the auction." Swaboda0031

January 14 at 2:24am: "...If only a group of 'ladies' from Alabama had kept their word..." Swaboda0082

"Sherry that is probably what it will come down to 'This merry band of morons can't seem to figure out they are in the wrong'" Swaboda0125

"And Gideon needs the LEADERSHIP of another Cavalier??!? I'm pretty sure I'M the leader in this house. I can't write what I'd like to do to this 'woman' after reading the above" Swaboda0126

"Yvonne share it with EVERYONE you know. ☺" Swaboda0127

"Correct, Jo Ann. The whole group of them have been expelled." Swaboda0132

"Many people advised Carolyn about the possibility of pursuing theft charges"  
Swaboda0149

"These people never stop lying." "I'm surprised their noses even fit in a room  
anymore..." Swaboda0191

Particular to Angie: "Police are looking for a man named Hubbard who murdered  
a woman in Alabama and has kidnapped another woman." And she shared Nancy  
Grace's post." Swaboda0013; "Yes, this article is about the Angie Ingram being  
discussed here" Swaboda 0080

To understand the other parts of the conversations or circumstances of Defendant Swoboda's  
publications, please see Defendant Swoboda's entire Facebook history to be produced and her  
comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully  
comments have caused and/or contributed to a forum of hate, harassment and cyber bullying  
without any proof of wrongdoing.

Defendant Kenney made the following statements about all Plaintiffs:

"This should get the world talking- and hopefully Gideon and the others kept  
under false pretenses with donated funds moved to the appropriate Cavalier  
Rescue USA- rogue activity has a consequence" Swaboda0084

"...Maggie...had a return clause in the sales contract...The full extent of the  
poorly thought out decisions made by this group might not have had such a bright  
light shines on their misdeeds..." Kenney001

"...Brittney Wilk and Angie Ingraham have two of the auction dogs. Published  
cost- for just those two was in excess of 10K." Kenney002.

"...The harm their actions have caused is tremendous. And not standing up for  
what is right and getting Gideon to his proper home has far reaching  
consequences." "But they surely need to prosecute-in my opinion" Kenney004

"oo? Does cav rescue have an app on file? From AI? might be able to sure if her  
full time job isn't listed. Breach of contract- -" "Not sure what the post meant-  
but If I was Mandy- ?? she lives in redneck area- where pickup trucks and rifles  
are common- not sure I would want to spend the rest of my life looking over my  
shoulder- nor finding multiple venues closed to my dog activities. Persona non-  
grata for thieves and people with no integrity. The Cavalier world was happy to  
support what was to be a rescue- but a group of people acting on their own with  
rules that only supported their personal agenda- NOT an endeavor that I would be  
proud to be a part of- any my hands are tainted by having supported it through  
GoFundMe." Kenney005

"Bait and switch-? GFM for Cavaliers- 11 or 12 non-cavaliers purchased?"



Interesting concept.” Kenney006

“... Their failure to make a timely return of Gideon- which was always the morally right thing and certainly the proper legal thing to do-has and will I the future- cause(d) immeasurable harm to many.” Kenney007

“...But I have never held people who lie in high regard...” Kenney009

“Another ‘dirty little secret’...” Kenney010

“Collecting for cavaliers- using the money to buy a French bulldog and other breeds- isn’t fraud??? Donors were deceived and when questions were asked- blocked- deleted or had a lawsuit filed against them. There has been no deception on Maggie’s part- she always wanted what she- and the Natl BOD of Cavalier Rescue agreed- believed was the very BEST US home for Gideon.” Kenney011

“...-Angie Ingram is the name of the ‘sales records’. And I know she was the person who tried to rescind (illegally) the transfer of Gideon to CavRes, USA. ...” Kenney012

“Guess we can only hope that the assignment of the judge in the cases is truly random and impartial- and say a few prayers to be on the side of angels.” “True- hoping the judge isn’t looking to adopt a cavalier.” “‘good ole boy’ network lives on.” Kenney013

“...The revelations and true plans on their part sickened many, damages reputations of many and have had long lasting consequences...” Kenney015

“...And the BB think the attention adds to their luster- instead of tarnishing their reputation.” Kenney016

“Oh dear- might they feel under attack now? Poor poort(stupid) girls.” Kenney017

“Truly an organization with questionable leadership- joking about the ‘silly cavalier’ with it’s head sticking out of a wire crate. That only happens when you do not realize it is UPSIDE DOWN. And she reviews applications and gives guidance to fosters??? Reckless endangerment to the safety of the rescue.” Kenney019

“Kim- going thru GoFundMe I can see little recourse for the fraud- it is a “Buyer Beware”... but to use our funds and then keep 10+-14 dogs as their own instead of letting them go through normal procedures is very troubling...” Kenney020

“Brittany and her group of friends need to be taught a lesson about integrity and honesty...GoFundMe is based on trust and they have forever damaged the process. I have never been good with people lying to me-...That is the same as stealing in my book. I certainly hope the Alabama Bar is paying close attention. In or out of court room actions of questionable character can be detrimental.”  
Kenney022

“...but I have said it before- there are consequences to deceitful activities...”  
Kenney023

“...she dolled out 10-14 to her ‘friends’ and co-volunteers...Gideon cost 10K++ and was one of the ones kept for personal satisfaction by a friend.” Kenney024.

“...- to falsely claim to be ‘rescue’ and then become private adoption services for a select few financed by the generosity of others. And ruining the further of GoFundMe for many. Oh well---live and learn.” Kenney025

“I doubt suing? but not a lawyer- but this situation as well as the 10-14 that went to her friends and the lawyer who was involved and took money under false pretenses and the group kept 2-10k dogs for themselves- again with OUR money”  
Kenney027

“Gideon Captors?” Kenney028

“-Brittany needs to understand that there are consequences for her actions for ALL the misappropriated dogs- let those homes be considered fosters- and have those people apply and be assigned dogs thru normal channels. And that Alabama Rescue not likely to ever get approved as a charity. So sad that years of good work were erased by a weekend of faulty decisions...” Friedman0020

“Hopefully the snowball of bad deeds, lies and miss-statements will crush their knee-jerk and ultimately false protestations of having done the right thing- and the proof of their badly built house of cards will collapse as so many in New England. I sure hope the Alabama cavalier owners that are not a part of this group of friends are distancing them from the disgraceful group. They have done irreparable harm to Cavalier Fundraising and GoFundMe-.” Kenney021

“Spread the word far and wide- especially in Alabama as to the great harm they are doing- causing inflated prices- feeding money to the puppy mill pockets- which perpetuates the problem. The people that follow their lead- and lines the pockets of the so called rescue are well meaning but greatly misinformed. As a wise woman once told me- “consider the source” of the information they receive. As always Follow the Money. Cut off the funding- to them and by extension CavRes, USA- who has always had the ability to claim ownership of Gideon- and get him returned to Maggie and has chosen not to...” Kenney029

Particular to Angie: "Can an attorney continue to practice after a felony conviction?" Kenney014; "And the Alabama Bar needs to be notified. Their deceptive practice as a group are a disgrace. The attorney- the moment the contract between Maggie and TE came to light should have known they were in deep trouble. And any advice she gave would be prejudicial since she kept a dog herself and knew they lied when soliciting funds." Kenney021.

To understand the other parts of the conversations or circumstances of Defendant Kenney's publications, please see Defendant Kenney's entire Facebook history to be produced and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Reed made the following statements about all Plaintiffs:

"Amen Sharon Utych, well stated. I too was duped into thinking they had all been signed over to cavalier rescue usa. This small group of women have done so much harm only for their own and their friends personal gain. It's disgusting!" Reed001

Comment by Jane Russell on Beth Reed's post in Justice for Gideon: "Prison-only what they deserve. It is fraudulent and misrepresentation of funds. Fingers crossed" Reed 004.

"Peggy, you hit it! Or at least one of the items. Time will sort this out, nothing more needs to be said." Reed007

"...It is about the unethical placement of him..."Reed008

"I believe the placement of Gideon was unethical...she is doing what she morally and legally should be doing." Reed011

"...Cyber harassment, I believe it is called." Reed019

"Do yall remember this huffingtonpost.com article?...Well, I just heard from a college friend who attended a function last night in DC where she overheard a conversation that this is on going and one of the GoFundMe scam the feds are looking into has to do with Cavalier King Charles Spaniels. She knows I breed Cavaliers. I saw her at our reunion in May and filled her in on what went down last winter. She's going to try to get me more info. She knows an investigative reporter quite well. I'll let you know if she finds out anything more." Reed023

"I have an UPDATE, finally! According to her source it is an ongoing investigation so not too much info can be gleaned. There are a couple of cases of crowd funding for dogs, and one involves CKCS. A very interesting one which involves a gofundme account that was in an individual's name. Said account

received a large number of international donations and then quickly generated a huge amount of fraud complaints, many of which were from those international donors. She said this might be all the info she's going to be able to get since it is currently being investigated and may be one of the Feds top crowd funding cases. She promised to let me know if she hears anything else." Reed030

"And it was not done out of ignorance, I know that for a fact." Reed028

To understand the other parts of the conversations or circumstances of Defendant Reed's publications, please see Defendant's Reed's entire Facebook history when she produces it and her comments in Beware Cavalier Rescue of Alabama where her repeatedly and purposefully comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing.

Defendant Friedman made the following statements about all Plaintiffs:

"I too was in rescue and never have I seen such manipulative egocentric and greedy behavior by any group."

"Here are a sampling of the comments. Some are the perpetrators, some people don't have a clue that a dog was in effect kidnapped." Friedman0019

"...Gideon was kidnapped and we are the villains?..." Friedman0005

19. Identify each and every "inaccurate and defamatory statement" published by defendants about any other Plaintiff. [See Amended Complaint, Paragraph 21] Include in your answer the identity of the individual defendant that made the statement, the date of the publication and the medium in which the publication was made.

**ANSWER:** See Answer to Interrogatory 18.

20. With regard to Paragraph 27 of Plaintiffs' Amended Complaint, identify each and every "post" and/or "defamatory comment", including the exact content of the post, the identity of the individual defendant responsible for the post, and the date of the post.

**ANSWER:** See Answer to Interrogatory 18.


21. With regard to Paragraph 28 of Plaintiffs' Amended Complaint, identify each and every "post" regarding "confidential information" and/or any "defamatory comment", including the exact content of the post, the identity of the individual defendant responsible for the post, and the date of the post.

**ANSWER:** Defendants posted the foster homes and adopting homes in the Facebook group Beware Cavalier Rescue of Alabama. The exact date of those posts is not known as this time. This answer will be supplemented if possible as discovery is completed.

22. With regard to Paragraph 33 of the Plaintiffs' Amended Complaint, identify each and every instance of Defendant "repeatedly and purposefully defaming Plaintiffs".

**ANSWER:** See Answer to Interrogatory 18. Defendants repeated and purposeful comments have caused and/or contributed to a forum of hate, harassment and cyber bullying without any proof of wrongdoing. Specifics of additional statements will be identified after Defendants' production of documents.

**(SIGNATURES ON THE FOLLOWING PAGE)**

  
\_\_\_\_\_  
Lisa Thompson

STATE OF ALABAMA    )  
St. Clair COUNTY    )

I, the undersigned authority, a Notary Public in and for said State and County, do hereby certify that Lisa Thompson, whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 6th day of February, 2015 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

  
\_\_\_\_\_  
Notary Public  
Commission Expires





Christina Martin  
Christina Martin

COMMONWEALTH OF PENNSYLVANIA )  
DAUPHIN COUNTY )

I, the undersigned authority, a Notary Public in and for said Commonwealth and County, do hereby certify that Christina Martin, whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 3 day of February, 2017 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

Christine L. Werner  
Notary Public  
Commission Expires 8/15/2019

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
CHRISTINE L. WERNER, Notary Public  
Susquehanna Twp., Dauphin County  
My Commission Expires August 15, 2019



Jasmine Lawson  
Jasmine Lawson

STATE OF ALABAMA    )  
JEFFERSON COUNTY    )

I, the undersigned authority, a Notary Public in and for said State and County, do hereby certify that JASMINE LAWSON, whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 10<sup>th</sup> day of FEBRUARY, 2017, 2015 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date



Michael M. Banks  
Notary Public  
Commission Expires 8/30/2020

Angie Ingram  
Angie Ingram

STATE OF ALABAMA )  
Jefferson COUNTY )

I, the undersigned authority, a Notary Public in and for said State and County, do hereby certify that Angie Ingram, whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 10th day of February, 2017 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

[Signature]  
Notary Public  
Commission Expires 9/20/20



*Amanda Markham Johnson*  
Amanda Markham Johnson

STATE OF ALABAMA    )  
Tuscaloosa COUNTY    )

I, the undersigned authority, a Notary Public in and for said State and County, do hereby certify that ~~Amanda Markham Johnson~~ whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 6 day of February, 2015 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

*Erin Judin*  
Notary Public  
Commission Expires

MY COMMISSION EXPIRES 4-30-2019  
MY COMMISSION EXPIRES 4-30-2019

Brittney Wilk  
Brittney Wilk

STATE OF ALABAMA )  
Jefferson COUNTY )

I, the undersigned authority, a Notary Public in and for said State and County, do hereby certify that Brittney Wilk whose name is signed to the foregoing instrument and who is known by me, acknowledged before me on 6<sup>th</sup> day of February, 2010 that, being duly informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

Katherine Jeebles Wilk  
Notary Public  
Commission Expires



/s/ Amanda Williamson  
AMANDA WILLIAMSON (WIL398)  
Attorney for Plaintiffs

**OF COUNSEL:**  
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Birmingham, Alabama 35202  
Telephone: (205) 326-3336  
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E-mail: [Amanda@hgdlawfirm.com](mailto:Amanda@hgdlawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2017 I electronically filed the foregoing with the Clerk of Court via Ala-File system which will send notification of such filing to all counsel of record.

/s/ Amanda Williamson  
AMANDA WILLIAMSON (WIL398)