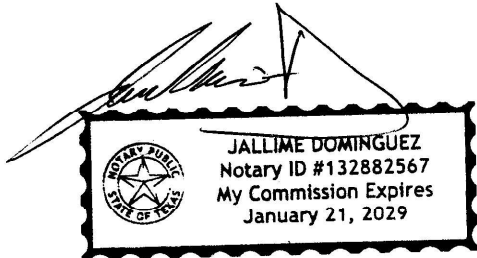


- a. Principal Place of Business for BLOGGER INC
BLOGGER INC C/O Mark Burke
46 Kingwood Greens,
Kingwood, TX 77339
- b. Agent for Service of Process for BLOGGER INC
AGENTS & CORPORATIONS Registered Agent for Service
BLOGGER INC
1201 N. Orange Street # 600
Wilmington, DE 19801

EXECUTED THIS 11th day of APRIL, 2025 at HARRIS COUNTY.



A handwritten signature of Andrew Lehman in black ink.

ANDREW LEHMAN/ Plaintiff Pro Se
957 Nasa Parkway # 1102
Houston, TX 77058
Lehmanlaw2002@gmail.com
713-903-9690

CASE NO. 2025-14896

HARRIS COUNTY

215TH DISTRICT COURT

**AMENDED PETITION
FOR DOMESTICATION
OF A FOREIGN JUDGMENT**

V.

Defendant,

4. Defendant BLOGGER INC, is a not for profit corporation organized in the state of Delaware, with its registered agent for service of process as AGENTS & CORPORATIONS INC, 1201 N Orange St., Suite 600, Wilmington, DE 19801
5. This Petition is brought pursuant to the Texas Uniform Enforcement of Foreign Judgments Act, Chapter 35 of the Texas Civil Practice and Remedies Code, for the domestication of a foreign judgment rendered by the Los Angeles County Superior Court, California, on December 2, 2024, in the case styled:

ANDREW LEHMAN et al v. Blogger Inc., Case No. 23-STCV-00341

II. FOREIGN JUDGMENT

6. On December 2, 2024, the Los Angeles County Superior Court entered a judgment in favor of Plaintiff[s] and against Defendant in the amount of \$1,992,994.16, and equitable relief for the Plaintiff[s] commanding this Defendant BLOOGER INC to take down the dozens of false, libelous, tortious, defamatory internet postings and blogs on the Defendant's wholly owned website www.lawsintexas.com. A certified copy of the foreign judgment is attached hereto as Exhibit 1.
7. The foreign judgment is final, has not been appealed, and is enforceable under the laws of California.

8. Defendant, **BLOGGER INC.**, is a not-for-profit corporation doing business in Harris County, Texas, and has its principal place of business located at 46 Kingwood Greens Drive, Kingwood, Texas, 77339.

III. PREREQUISITES FOR DOMESTICATION

9. The foreign judgment that sought to be domesticated is within the time limit for filing under Texas law, as it was rendered within 10 years of the filing of this petition.

10. Defendant, **BLOGGER INC.**, D/B/A **LAWSINTEXAS.COM** resides or does business in Harris County, Texas, and the judgment debtor is subject to the jurisdiction of this Court.

11. Plaintiff[s] have provided notice of this petition to Defendant in accordance with Texas Civil Practice and Remedies Code §35.003, and Defendant has been given proper opportunity to contest the domestication of the judgment.

IV. PRAYER FOR RELIEF

WHEREFORE, Plaintiff[s] pray that this Court:

1. Grant this Petition and recognize the foreign judgment entered by the Los Angeles County Superior Court on December 2, 2024, as a judgment of this Court.

2. Order that the foreign judgment be domesticated in Harris County, Texas, and that it be enforceable as if it were a judgment originally rendered by this Court.
3. Award Plaintiff[s] the relief imposed in the Judgment against this Defendant **BLOGGER INC D/B/A WWW.LAWSINTEXAS.COM**, including monetary relief and equitable relief, and award such other and further relief to which Plaintiff[s] may be entitled, whether at law or in equity.

Respectfully submitted,

/s/ ANDREW LEHMAN

Andrew Lehman
Plaintiff Pro Se
957 Nasa Parkway, Suite 1102
Houston, TX 77058
713-903-9690
Lehmanlaw2002@gmail.com

Respectfully submitted,

/s/ MONICA RILEY

Monica Lynn Riley
Plaintiff Pro Se
957 Nasa Parkway, Suite 1102
Houston, TX 77058
346-626-8530
monrileyyy@aol.com

VERIFICATION

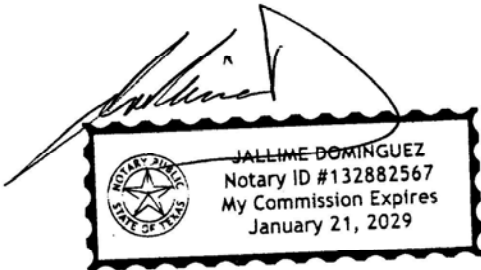
I, ANDREW LEHMAN being duly sworn, depose and state that I am the Plaintiff in this action, and that the facts set forth in this Petition are true and correct to the best of my knowledge and belief.



ANDREW LEHMAN
Plaintiff

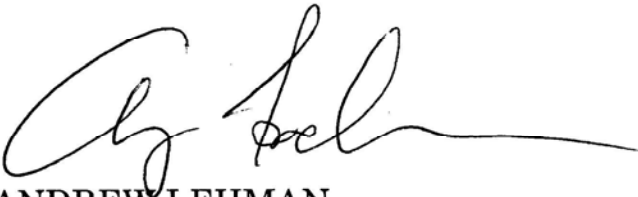
SUBSCRIBED AND SWORN TO before me this 21 day of April, 2025.

Notary Public, State of Texas



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this ^{Amended} Petition for Domestication of Foreign Judgment has been served on the Defendant, Blogger Inc., by Certified Mail on this 11 day of April, 2025.



ANDREW LEHMAN

Plaintiff

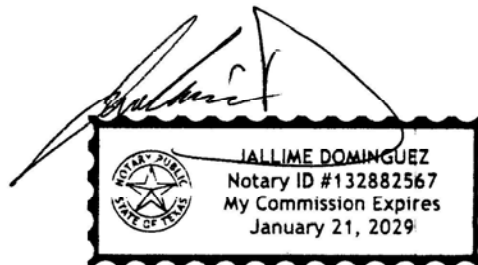


EXHIBIT “A”

A Certified Copy of the Los Angeles Superior Court Judgment from December 2, 2024, against the Defendant **BLOGGER INC., D/B/A LAWSINTEXAS.COM**, marked as EXHIBIT “A”.

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp FILED Superior Court of California County of Los Angeles 12/12/2024 David W. Slayton, Executive Officer, Clerk of Court By: <u>J. Jones</u> Deputy
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		
PLAINTIFF(S): Monica Lynn Riley et al		
DEFENDANT(S): BROWSE R WEB, LLC,, et al.		
NOTICE OF ENTRY OF: <input checked="" type="checkbox"/> JUDGMENT <input type="checkbox"/> DISMISSAL <input type="checkbox"/> OTHER ORDER <input type="checkbox"/> AMENDED		CASE NUMBER: 23STCV00341

TO THE PARTIES AND TO THEIR ATTORNEYS OF RECORD, you are hereby given notice of entry of:

☒ Judgment in the above-entitled matter, entered on 12/12/2024
☐ Order of Dismissal in the above-entitled matter, filed on _____
☐ Order _____ filed on _____

☐ Judgment debtor is a natural person, and as provided in Code Civ. Proc., §§ 683.110, 685.010:
 \$ _____ of this judgment is on a claim related to medical expenses
 \$ _____ of this judgment is on a claim related to personal debt

David W. Slayton, Executive Officer / Clerk of Court

Dated: 12/18/2024

By J. Jones
Deputy Clerk

NOTICE OF ENTRY OF JUDGMENT / DISMISSAL / ORDER

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp FILED Superior Court of California County of Los Angeles 12/12/2024 <small>David W. Slayton, Executive Officer / Clerk of Court</small> By: <u>J. Jones</u> , Deputy
COURTHOUSE ADDRESS: Stanley Mosk Courthouse 111 North Hill Street, Los Angeles, CA 90012		
PLAINTIFF/PETITIONER: Monica Lynn Riley et al		
DEFENDANT/RESPONDENT: BROWSE R WEB, LLC,, et al.		
CERTIFICATE OF MAILING		CASE NUMBER: 23STCV00341

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of Judgment / Dismissal / Other Order upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Andrew Lehman
5551 Hollywood Blvd.
Suite 1038
Hollywood, CA 90028

~~Monica Lynn Riley~~
2001 TIMBERLOCH PLACE
THE WOODLANDS, TX 77380

Dated: 12/19/2024

David W. Slayton, Executive Officer / Clerk of Court

By: J. Jones
Deputy Clerk

CERTIFICATE OF MAILING

I certify that this is a true and correct copy of the original
on file in or issued from this office, consisting of 2 pages.



DAVID W. SLAYTON, Executive Officer / Clerk of the
Superior Court of California, County of Los Angeles.

FEB 26 2025

Date:

By:

A handwritten signature in black ink, appearing to read "M. Aguayo", written over a horizontal line.

Deputy

M. Aguayo

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):

[BOTH PLAINTIFFS' IN ATTACHMENT "CAPTION"]

FOR COURT USE ONLY

TELEPHONE NO.:

FAX NO. (Optional):

EMAIL ADDRESS (Optional):

ATTORNEY FOR (Name):

FILED
Superior Court of California
County of Los Angeles

DEC 12 2024

David W. Slayton, Executive Officer/Clerk of Court

By: J. Jones, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 N. HILL STREET

MAILING ADDRESS: 111 N HILL STREET

CITY AND ZIP CODE: LOS ANGELES, CA 90012

BRANCH NAME: STANLEY MOSK

PLAINTIFF: ANDREW LEHMAN ET AL

DEFENDANT: BLOGGER, INC, ET AL.

JUDGMENT

☐ By Clerk☒ By Default☐ After Court Trial☒ By Court☐ On Stipulation☐ Defendant Did Not
Appear at Trial

CASE NUMBER:

23STCV00341

JUDGMENT

1. ☒ BY DEFAULT

- a. Defendant was properly served with a copy of the summons and complaint.
- b. Defendant failed to answer the complaint or appear and defend the action within the time allowed by law.
- c. Defendant's default was entered by the clerk upon plaintiff's application.
- d. ☐ Clerk's Judgment (Code Civ. Proc., § 585(a)). Defendant was sued only on a contract or judgment of a court of this state for the recovery of money.
- e. ☒ Court Judgment (Code Civ. Proc., § 585(b)). The court considered
- (1) ☐ plaintiff's testimony and other evidence.
- (2) ☒ plaintiff's written declaration (Code Civ. Proc., § 585(d)).

2. ☐ ON STIPULATION

- a. Plaintiff and defendant agreed (stipulated) that a judgment be entered in this case. The court approved the stipulated judgment and
- b. ☐ the signed written stipulation was filed in the case.
- c. ☐ the stipulation was stated in open court ☐ the stipulation was stated on the record.

3. ☐ AFTER COURT TRIAL. The jury was waived. The court considered the evidence.

- a. The case was tried on (date and time):
before (name of judicial officer):

b. Appearances by:

☐ Plaintiff (name each):☐ Plaintiff's attorney (name each):

(1)

(1)

(2)

(2)

☐ Continued on Attachment 3b.☐ Defendant (name each):☐ Defendant's attorney (name each):

(1)

(1)

(2)

(2)

☐ Continued on Attachment 3b.☐ Defendant did not appear at trial. Defendant was properly served with notice of trial.☐ A statement of decision (Code Civ. Proc., § 632) ☐ was not ☐ was requested.

PLAINTIFF: ANDREW LEHMAN ET AL. DEFENDANT: BLOGGER, INC ET AL	CASE NUMBER: 23STCV00341
--	--------------------------

JUDGMENT IS ENTERED AS FOLLOWS BY: ☒ THE COURT ☐ THE CLERK

4. ☐ **Stipulated Judgment.** Judgment is entered according to the stipulation of the parties.

5. **Parties.** Judgment is

a. ☒ for plaintiff (name each):

MONICA LYNN RILEY, ANDREW LEHMAN

and against defendant (names):

BLOGGER, INC., (CONTINUED ON ATTACHMENT 5A)

☐ Continued on Attachment 5a.

c. ☐ for cross-complainant (name each):

and against cross-defendant (name each):

☐ Continued on Attachment 5c.

b. ☐ for defendant (name each):

d. ☐ for cross-defendant (name each):

6. **Amount.**

a. ☐ Defendant named in item 5a above must pay plaintiff on the complaint:

(1) <input checked="" type="checkbox"/> Damages	\$	5,000,000.00
(2) <input type="checkbox"/> Prejudgment interest at the annual rate of %	\$	1,991,194.12
(3) <input type="checkbox"/> Attorney fees	\$	
(4) <input type="checkbox"/> Costs	\$	
(5) <input type="checkbox"/> Other (specify):	\$	
(6) TOTAL	\$	5,000,000.00

c. ☐ Cross-defendant named in item 5c above must pay cross-complainant on the cross-complaint:

(1) <input type="checkbox"/> Damages	\$	
(2) <input type="checkbox"/> Prejudgment interest at the annual rate of %	\$	
(3) <input type="checkbox"/> Attorney fees	\$	
(4) <input type="checkbox"/> Costs	\$	
(5) <input type="checkbox"/> Other (specify):	\$	
(6) TOTAL	\$	

b. ☐ Plaintiff to receive nothing from defendant named in item 5b.

☐ Defendant named in item 5b to recover costs \$

☐ and attorney fees \$

d. ☐ Cross-complainant to receive nothing from cross-defendant named in item 5d.

☐ Cross-defendant named in item 5d to recover costs \$

☐ and attorney fees \$

7. ☐ Judgment debtor is a natural person, and as provided in Code Civ. Proc., §§ 683.110, 685.010:

\$ of this judgment is on a claim related to medical expenses

\$ of this judgment is on a claim related to personal debt

8. ☐ Other (specify):

[ORDER FOR INJUNCTIVE RELIEF SET FORTH IN ATTACHMENT 8] [SEE ATTACHED ATTACHMENT 8]

Date: 12/12/2024

☒

JUDICIAL OFFICER

Date:

☐

Clerk, by

GAIL KILLEFER

, Deputy



CLERK'S CERTIFICATE (Optional)

I certify that this is a true copy of the original judgment on file in the court.

Date: FEB 26 2025

David W. Slayton
Clerk, by

[Signature]

, Deputy

M. Aguayo

SHORT TITLE:

ANDREW LEHMAN ET AL. V. BLOGGER, INC ETAL.

CASE NUMBER:

23STCV00341

ATTACHMENT (Number): CAPTION*(This Attachment may be used with any Judicial Council form.)*

MONICA LYNN RILEY
24403 CONDORS NEST
KATY, TX 77494
346-468-9652
MONRILEYYY@AOL.COM
Plaintiff Pro Per

ANDREW LEHMAN
7190 W SUNSET BLVD SUITE 237
LOS ANGELES, CA 90028
713-903-9690
LEHMANLAW2002@GMAIL.COM
Plaintiff Pro Per

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1*(Add pages as required)*

SHORT TITLE:

ANDREW LEHMAN ET AL. V. BLOGGER, INC ET AL.

CASE NUMBER:

23STCV00341

ATTACHMENT (Number): 5A

(This Attachment may be used with any Judicial Council form.)

DEFENDANT BLOGGER, INC., ~~D/B/A LAWINTXAS.COM~~, a Delaware 501(c)(3) Not for Profit Corporation.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____

(Add pages as required)

ATTACHMENT 8:

The Court GRANTS the Request for Injunctive Relief, ordering Defendant Blogger, Inc. to remove the following defamatory 14 articles that Plaintiffs listed in their proposed Final Order & Judgment of Default as Against Defendant BLOGGER, INC., dba lawintexas.com:

- a. <https://lawsintexas.com/threatening-journalists-thug-without-a-jd-sentenced-to-27-months-jail-by-federal-judge-talwani/>
- b. <https://lawsintexas.com/thug-with-a-jd-andrew-lehmans-articles-triggered-a-reaction-from-indicted-and-incarcerated-chris-badsey/>
- c. <https://lawsintexas.com/lehman-data-analytics-2024/>
- d. <https://lawsintexas.com/the-war-on-whistleblowers/>
- e. <https://lawsintexas.com/lisa-mills-is-attempting-to-evict-scary-andrew-lehman-from-her-magnolia-residence/>
- f. <https://lawsintexas.com/take-2-attorney-chris-gregg-falsely-refuses-pia-request-in-continued-blackballing-of-lit-by-texas-gov-entities/>
- g. <https://lawsintexas.com/transparency-in-question-harris-county-attorneys-office-rejects-open-records-request-in-high-stake-cases/>
- h. <https://lawsintexas.com/the-cfpb-claim-3m-restitution-from-forensic-loan-scam-co-the-fact-is-the-3m-is-suspended-these-two-thieves-should-be-in-jail/>
- i. <https://lawsintexas.com/gcso-bodycam-withheld-after-attempted-murder-of-patrick-cline-by-andrew-lehman-in-galveston/>
- j. <https://lawsintexas.com/2022-ends-with-investigation-into-andrew-p-lehman-cfla-lehman-brothers-llc-lehman-data-analytics-et-al/>
- k. duplicate of h, above.
- l. <https://lawsintexas.com/tag/certified-forensic-loan-auditors-llc/>
- m. <https://lawsintexas.com/tag/falisha-lehman-v-andrew-lehman/>
- n. <https://lawsintexas.com/tag/andrew-lehman/>
- o. <https://lawsintexas.com/status/1770902273519943757>

The Court also GRANTS the Request for Injunctive Relief, ordering Defendant Blogger, Inc. to remove the following social media post:

<https://x.com/lawsinusa/status/1770902273519943757>

EX-100-7024

I certify that this is a true and correct copy of the original
on file in or issued from this office, consisting of 5 pages.



DAVID W. SLAYTON, Executive Officer / Clerk of the
Superior Court of California, County of Los Angeles

Date: 2/27/25 J. Davis Deputy

J. Davis

DEC 02 2024

David W. Slayton, Executive Officer/Clerk of Court

By: J. Jones, Deputy

Hearing Date: 11/25/2024
(23STCV00341)

Lehman, et al. v. Burke et al.

Moving Parties: Plaintiffs Andrew Lehman and Monica Lynn Riley (in pro per)

Opposing Party: BLOGGER Inc.

Relief Requested: Request for Default Judgment and Request for Injunctive Relief

Ruling: The Court GRANTS default judgment against Blogger, Inc. in the amount of \$1,991,194.12, and GRANTS the Request for Injunctive Relief, ordering Defendant Blogger, Inc. to remove its defamatory 14 articles and one social media post listed below.

BACKGROUND

This is a defamation action. On January 9, 2023, Plaintiffs Andrew Lehman, Monica Lynn Riley (collectively "Plaintiffs"), and Minors 1 to 3 filed this action. On January 18, 2024, Plaintiffs orally requested the Court to dismiss Minors 1 to 3, and the Court granted the request.

On June 20, 2023, Plaintiffs filed the First Amended Complaint (FAC) against Defendants Blogger, Inc. D/B/A lawintexas.com, Browserweb Incorporated, Browser Web, LLC, John Burke, Joanna Burke, Mark Burke, and Does 1 to 10. The FAC alleges Plaintiff Andrew Lehman owns a litigation support business and that Defendants John and Joanna Burke's house in Burke's Kingwood, Texas was foreclosed upon in the United States District Court in the Southern District of Texas. As a result, Defendants allegedly have maliciously targeted all persons in the legal system involved in the foreclosure action, including Plaintiff Andrew Lehman. Defendants, around June 2020, allegedly posted photos of Plaintiffs and their three children and intentionally defamed Plaintiffs on the website lawintexas.com and other platforms. Plaintiff Andrew Lehman allegedly lost business as a result of Defendants' defamation.

The FAC alleges the following causes of action: (1) Defamation (Common Law and Civ. Code § 46), (2) Intentional Interference with Prospective Economic Advantage, (3) Violation of Business & Professions Code § 17200 et seq. (Unfair Competition Law), (4) Civil Conspiracy, (5) Harassment, (6) Stalking, (7) Misappropriation of Likeness (Civ. Code § 3344), (8) Use of Minor's Likeness without Consent (Civ. Code § 3344), (9) Intentional Infliction of Emotional Distress, (10) Negligence, and (11) Injunctive Relief. The FAC seeks damages in the amount of \$15 million and a permanent injunction, in addition to other remedies.

11/26/2024

On November 17, 2023, Plaintiffs dismissed all Defendants other than Blogger, Inc. at a case management conference hearing. Defendant failed to appear in the case. On June 18, 2024, the Court ordered Plaintiffs to file documents for a default prove-up.

On August 28, 2024, default was entered against Defendant Blogger, Inc. Plaintiffs also filed their Request for Default Judgment (Form CIV-100), CCP § 585 declarations, and the summons and proof of service for the First Amended Complaint.

On September 3, 2024, Plaintiffs filed the proposed default judgment (Form JUD-100) and an amended declaration of Plaintiff Andrew Lehman.

On September 25, 2024, Plaintiffs filed a Memorandum of Points & Authorities in Support of the Default Judgment as to Defendant Blogger, Inc. (MPA). Plaintiffs argue that default judgment and injunctive relief should be granted based on the reasoning in the *Alpha Phoenix Industries LLC v. SCInternational Incorporated et al.* (Case No. CV-12-1848-PHX-SMM), heard against Defendants John and Joanna Burke in the United States District Court for the District of Arizona. (MPA, Exh. 1.)

On September 30, 2024, Plaintiffs filed a proposed order regarding the request for injunctive relief and default judgment award in a tentative ruling format. The matter is now before the court.

REQUEST FOR DEFAULT JUDGMENT AND REQUEST FOR INJUNCTIVE RELIEF

I. Legal Standard

A. Default Judgment

California Rules of Court, Rule 3.1800 sets forth the requirements for default judgments. In pertinent part, the rule dictates that a party must use form CIV-100 and file the following documents with the clerk: (1) except in unlawful detainer cases, a brief summary of the case identifying the parties and the nature of plaintiff's claim; (2) declarations or other admissible evidence in support of the judgment requested; (3) interest computations as necessary; (4) a memorandum of costs and disbursements; (5) a declaration of nonmilitary status for each defendant against whom judgment is sought; (6) a proposed form of judgment; (7) a dismissal of all parties against whom judgment is not sought or an application for separate judgment against specified parties under CCP § 579, supported by a showing of grounds for each judgment; (8) exhibits as necessary; and (9) a request for attorney fees if allowed by statute or by the agreement of the parties. (Cal. Rules of Court, Rule 3.1800(a)(1)-(9).)

B. Injunctive Relief

"The elements of a cause of action for injunctive relief are (1) a tort or other wrongful act constituting a cause of action; and (2) irreparable injury, i.e., a factual showing that the wrongful act constitutes an actual or threatened injury to property or personal rights which cannot be compensated by an ordinary damage award." (*Brownfield v. Daniel Freeman Marina Hospital*

FILED
2024

(1989) 208 Cal.App.3d 405, 410.) Notably, "injunctive relief is a remedy and not, in itself, a cause of action, and a cause of action must exist before injunctive relief can be granted." (*Camp v. Board of Supervisors* (1981) 123 Cal.App.3d 334, 356.)

IV. Discussion

A. Default Judgment

Plaintiffs have filed a CIV-100 form with the appropriate sections filled out, including a declaration of mailing (mailed on August 20, 2024 and August 28, 2024) and declaration of nonmilitary status for the Defendant. Costs and disbursements were waived. Plaintiffs dismissed all Defendants except Blogger, Inc. on November 17, 2023. Plaintiff submitted a proposed judgment on Form JUD-100 and in tentative ruling format. Plaintiffs have also filed CCP § 585 declarations on behalf of Andrew Lehman and Monica Lynn Riley. The declarations contain a brief summary of the case and nature of Plaintiffs' claim. Plaintiffs do not seek interest, and thus, an interest calculation is not needed. Plaintiff have also filed a proof of service of summons and FAC. Defendant Blogger, Inc. was served through registered agent, Jennifer Franz, at 1201 N Orange St., Suite 600, Wilmington, DE 19801 on July 12, 2023 (POS filed July 13, 2024) and again on January 26, 2024 (POS filed August 28, 2024). The Court finds all California Rules of Court, Rule 3.1800 requirements have been met.

On the CIV-100 Form and JUD-100, Plaintiffs request for a judgment in the amount of \$5,000,000.00 to be entered—this amount does not exceed the amount requested in the FAC. Yet in the MPA and proposed order (tentative ruling format), Plaintiffs request \$2,315,342.00. This amount was calculated by averaging the yearly income for Plaintiff's business from 2015 to 2024 (See MPA, Exh. 2.) The average yearly income for 2015 to July-2020 (when the alleged defamation began) was \$551,048.40. The average yearly income for mid-2020 to three-fourths through 2024 was \$87,980.00. Plaintiffs subtracted the latter from the former to get \$463,068.40—the average loss in earnings per year after the alleged defamation. This amount was multiplied by 5 years (2020 to 2024) to get a total of \$2,315,342.00—the total loss in earnings due to the alleged defamation.

Plaintiffs' method of calculation is based off of a previous judgment against Defendants John and Joanna Burke in the case *Alpha Phoenix Industries LLC v. SCInternational Incorporated et al.* (Case No. CV-12-1848-PHX-SMM), granted by the United States District Court for the District of Arizona. In that case, the district court found default judgment appropriate and awarded compensatory damages in the amount of \$291,029.00. The court calculated this amount by calculating the pre-defamation monthly average of sales and determining the amount of lost sales for each month after the defamation. The court totaled the amount of lost sales for March 2012 to June 2012 of 11,641 and multiplied the total sales by \$25.00, the profit amount per sale corroborated by a witness. The total lost profit was \$291,029.00.

The Court notes that it cannot consider authority from other jurisdictions but acknowledges the existence of this case. In the light of the similar circumstances, the Court finds this method of calculation reasonable. The only flaw in the calculation is the five-year multiplier.

12/18/2024

The Court finds that July 2020 to November 2024 is around 4.3 years, not 5 years. Thus, the correct calculation should be $\$463,068.40 \times 4.3 = \$1,991,194.12$.

The Court GRANTS default judgment against Blogger, Inc. in the amount of \$1,991,194.12.

B. Injunctive Relief

Plaintiffs argue that this Court should grant injunctive relief ordering Defendant Blogger, Inc. to delete its 14 defamatory articles and one social media post. Such injunctive relief is similar to that granted in *Alpha Phoenix Industries LLC v. SCInternational Incorporated et al.* (Case No. CV-12-1848-PHX-SMM). In that case, the district court found that plaintiff API was a private figure, and defendants John and Joanna Burke defamed plaintiff. The district court found that plaintiffs suffered and would continue to suffer from defendants' defamatory statements posted on interactive computer services websites. The court found that although it could not order the web service providers to remove the postings under 47 U.S.C. §230(c)(1), defendants could be ordered to remove the postings because 1) the postings cause irreparable harm to plaintiff; 2) plaintiff's remedies at law are inadequate to compensate the harm; 3) the communications were defamatory and thus the public's interests would not be injured by the order to remove the postings; and 4) a balancing of the hardships weighed in favor of plaintiff. The Court again notes that it cannot consider authority from other jurisdictions but acknowledges the existence of this case.

The Court assesses 1) whether Plaintiff has stated a claim for defamation; and 2) whether Plaintiff will suffer irreparable harm. The Court also discusses a potential prior restraint issue.

i. Defamation

"The elements of a defamation claim are (1) a publication that is (2) false, (3) defamatory, (4) unprivileged, and (5) has a natural tendency to injure or causes special damage." [Citations.] The defamatory statement must specifically refer to, or be "of and concerning," the plaintiff. [Citations.] (*John Doe 2 v. Superior Court* (2016) 1 Cal.App.5th 1300, 1312.)

The Court finds that by failing to answer this defamation action, Defendant Blogger, Inc. admits to the factual allegations in the FAC. "Substantively, [t]he judgment by default is said to 'confess' the material facts alleged by the plaintiff, i.e., the defendant's failure to answer has the same effect as an express admission of the matters well pleaded in the complaint." [Citations.] The 'well-pleaded allegations' of a complaint refer to 'all material facts properly pleaded, but not contentions, deductions or conclusions of fact or law.' [Citations.] (*Kim v. Westmoore Partners, Inc.* (2011) 201 Cal.App.4th 267, 281.)

The Court finds that, where allegations in the FAC and Plaintiffs' declarations are taken as true, Plaintiffs have proved that Defendant Blogger, Inc. published false, unprivileged, and injurious statements regarding Plaintiffs. For example, Plaintiff Andrew Lehman's declaration states the following:

"2. Beginning with its first publication in July of 2020, the Defendant began a four year tirade of publishing over 100 articles, blogs, and other social media

11-20-2024

about the Plaintiff and his wife and children making fun of them and publishing private pictures, home addresses, school addresses, and harassing and stalking the plaintiff with cyber expertise, all to the commercial benefit of its up and coming legal news blog www.lawsintexas.com which had just begun its circulation."

"3. The Defendant and its owner Mark Burke were formerly clients of Mr. Lehman's company Certified Forensic Loan Auditors LLC some years before and the Defendant's owner Mark Burke had lost his home to foreclosure and had a distaste for the Plaintiff Andrew Lehman as a result. "

"4. Defendant's initial publication was entitled "the CFPB claim restitution from Forensic Loan Scam Company... the fact is the \$3 million is suspended. This thief [ANDREW LEHMAN] hasn't got \$30,000.00 let alone \$3, million." The article went on to show pictures of Plaintiff with his wife and 3 minor children all under the age of 13 years, calls Lehman a scam, fraud, Pimp, Drug Dealer, Murder and thief all of which are untrue, false, and malicious intended to injur[e] the reputation of Plaintiff."

(Lehman Decl., ¶ 2-4.)

The FAC also contains numerous examples of Defendant Blogger, Inc.'s defamatory statements. Defendant Blogger, Inc., by failing to appear in this action, admits to the well-pleaded allegations in the FAC. (See *Kim*, supra, 201 Cal.App.4th at p. 281.) The Court finds that Plaintiff has provided sufficient evidence to prove a cause of action for defamation.

ii. Irreparable Harm

Plaintiff will suffer irreparable harm from the defamatory statements if they are allowed to remain on the website. Plaintiffs have provided evidence that Plaintiff Andrew Lehman has lost significant income as a proximate result of Defendant Blogger, Inc.'s defamatory statements:

"14. These actions of the Defendant are causing the Plaintiff to lose approximately \$250,000.00 - \$500,000.00 annually, from 2020, 2021, 2022, 2023, 2024, and will certainly cause the Plaintiff to continue to lose income in the future because of the permanent disparagement that has occurred by Defendant from his false and defamatory publications."

"18. As a proximate result of Defendant's disparaging Plaintiff on the internet and preventing Plaintiff's internet-based companies from getting clients and damaging the professional reputation the damages from 2020 (\$250,000), 2021 (\$500,000), 2022 (\$500,000), 2023 (\$500,000), and 2024 (\$500,000) are already accumulated over \$2,000,000 in lost wages alone."

Plaintiff further suffers from emotional damage as a result of the defamatory statements:

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"20. Plaintiff has also been forced to get medical treatment from the severe stress and anxiety from the nonstop harassment from the Defendant and now sees a Psychiatrist once a month, and a therapist twice a week while also being prescribed medications for depression, anxiety, and post-traumatic stress syndrome."

The Court finds that Plaintiffs will suffer irreparable harm as long as the statements remain on the website. Remedies at law are not adequate~~—as long as the defamatory statements~~ remain on the website, Plaintiff will likely continue to suffer loss of economic profits and emotional damages. Because Plaintiffs have stated a cause of action for defamation and proved they will suffer irreparable harm, the Court finds a permanent injunction ordering Defendant Blogger, Inc. to remove its defamatory articles and social media post is warranted here. (See *Brownfield*, supra, 208 Cal.App.3d at p. 410.)

iii. Prior Restraint Issues

The Court notes that there may be First Amendment issues regarding injunctions awarded in defamation cases. There is also a layer of complexity added where the issue of defamation is determined via default judgment as is the case here.

"An order prohibiting a party from making or publishing false statements is a classic type of an unconstitutional prior restraint." (*Evans v. Evans* (2008) 162 Cal.App.4th 1157, 1167.) But "an injunction issued following a trial that determined that the defendant defamed the plaintiff that does no more than prohibit the defendant from repeating the defamation, is not a prior restraint and does not offend the First Amendment." (*Balboa Island Village Inn, Inc. v. Lemen* (2007) 40 Cal.4th 1141, 1148.)

The Court resolves these issues by comparing this case to *Hassell v. Bird* (2016) 247 Cal.App.4th 1336, 1360. In that case, the trial court granted a default judgment against an individual who posted defamatory comments about the plaintiff law firm on Yelp, a nonparty customer review website. The trial court granted a preliminary injunction 1) ordering the defendant to take down its comments on Yelp; and 2) ordering Yelp to remove all reviews posted by defendant and to remove any subsequent comments within 7 business days of the court's order. (*Id.* at p. 1345.) Yelp, as the website operator, appealed the injunction to remove defendant's comments, arguing the injunction was an improper prior restraint and that the Communications Decency Act (CDA) (47 U.S.C. §230(c)(1))¹ barred the injunction. The Appellate Court found the injunction was not an improper prior restraint and was not barred by the CDA. (*Id.* at p. 1361, 1365.) The Supreme Court overruled the Appellate Court decision finding that Yelp could validly challenge the injunction under the CDA even though it was not a defendant. (*Hassell v. Bird* (2018) 5 Cal.5th 522, 527.)²

¹ 47 U.S.C. §230(c)(1) states the following: "No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider."

Unlike in *Hassell*, the injunction here does not require a third-party web servicer (like Yelp) to take down defamatory comments of others, which may create issues under the CDA. Defendant Blogger, Inc. made defamatory statements on its own website.

The Court draws similarities to *Hassell* only to the extent the Appellate Court interpreted *Balboa Island*'s holding that injunctions to prohibit the repeating of speech found to be defamatory is not a prior restraint. The Appellate Court found "nothing in *Balboa Island* supportive of [the] contention that [its holding that an injunction issued following a trial that determined defendant made defamatory statements is not a prior restraint is limited to determinations following a jury trial]. In fact, the injunction in [*Balboa Island*] was issued after a bench trial." (*Hassell*, supra 247 Cal.App.4th at p. 1361.) The Appellate Court essentially found that, where the trial court determined the defendant made defamatory statements via default judgment, that there was no prior restraint issue. It was of no issue that there was no jury trial. The Supreme Court did not question this reasoning. Neither the Appellate Court nor the Supreme Court in *Hassell* found any issue with the trial court's decision to impose an injunction ordering the defendant to take down the defamatory comments it made on Yelp via default judgment.

Under *Balboa Island* and *Hassell*, the Court here has properly determined that Defendant Blogger, Inc.'s articles and social media post were defamatory, and thus, a permanent injunction requiring Defendant Blogger, Inc. to take down its defamatory articles and social media post is not a prior restraint.

The Court GRANTS the Request for Injunctive Relief, ordering Defendant Blogger, Inc. to remove the following defamatory 14 articles that Plaintiffs listed in their proposed Final Order & Judgment of Default as Against Defendant BLOGGER, INC., dba lawintexas.com:

- a. <https://lawsintexas.com/threatening-journalists-thug-without-a-jd-sentenced-to-27-months-jail-by-federal-judge-talwani/>
- b. <https://lawsintexas.com/thug-with-a-jd-andrew-lehmans-articles-triggered-a-reaction-from-indicted-and-incarcerated-chris-badsey/>
- c. <https://lawsintexas.com/lehman-data-analytics-2024/>
- d. <https://lawsintexas.com/the-war-on-whistleblowers/>
- e. <https://lawsintexas.com/lisa-mills-is-attempting-to-evict-scary-andrew-lehman-from-her-magnolia-residence/>
- f. <https://lawsintexas.com/take-2-attorney-chris-gregg-falsely-refuses-pia-request-in-continued-blackballing-of-lit-by-texas-gov-entities/>
- g. <https://lawsintexas.com/transparency-in-question-harris-county-attorneys-office-rejects-open-records-request-in-high-stake-cases/>
- h. <https://lawsintexas.com/the-cfpb-claim-3m-restitution-from-forensic-loan-scam-co-the-fact-is-the-3m-is-suspended-these-two-thieves-should-be-in-jail/>
- i. <https://lawsintexas.com/gcso-bodycam-withheld-after-attempted-murder-of-patrick-cline-by-andrew-lehman-in-galveston/>
- j. <https://lawsintexas.com/2022-ends-with-investigation-into-andrew-p-lehman-cfla-lehman-brothers-llc-lehman-data-analytics-et-al/>

EE/20/2024

k. duplicate of h, above.

l. <https://lawsintexas.com/tag/certified-forensic-loan-auditors-llc/>

m. <https://lawsintexas.com/tag/falisha-lehman-v-andrew-lehman/>

n. <https://lawsintexas.com/tag/andrew-lehman-/>

o. <https://lawsintexas.com/status/1770902273519943757>

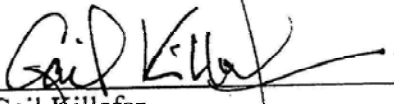
The Court also GRANTS the Request for Injunctive Relief, ordering Defendant Blogger, Inc. to remove the following social media post:

<https://x.com/lawsinusa/status/1770902273519943757>

CONCLUSION

For the reasons set forth above, the Court GRANTS Plaintiffs' Request for Default Judgment and Request for Injunctive Relief.

Dated: December 2, 2024



Gail Killefer
Judge, Los Angeles Superior Court

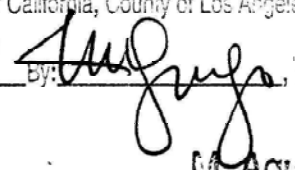
FILED
DEC 2 2024



I certify that this is a true and correct copy of the original on file in or issued from this office, consisting of 8 pages.

DAVID W. SLAYTON, Executive Officer / Clerk of the Superior Court of California, County of Los Angeles.

FEB 26 2025

Date: By:  Deputy

M. Aguayo

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 37

23STCV00341

ANDREW LEHMAN, et al. vs MARK BURKE, et al.

December 12, 2024

4:00 PM

Judge: Honorable Gail Killefer

Judicial Assistant: J. Jones

Courtroom Assistant: E. Avena

CSR: None

ERM: None

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Court Order/Request for Entry of Default Judgment

The Matter is submitted on Declaration pursuant to Code of Civil Procedure section 585(d).

The Court has read and considered the documents submitted in support of entry of Default Judgment.

Judgment is signed and filed this date.

Default Judgment by Court entered for Plaintiffs MONICAL LYNN RILEY and ANDREW LEHMAN against Defendant BLOGGER, INC. a Delaware 501(c)(3) Not for Profit Corporation on the Complaint filed by MONICA LYNN RILEY and ANDREW LEHMAN, on 01/09/2023 for Damages of \$1,991,194.12 for a Total of \$1,991,194.12.

Clerk is to give notice and notice of entry of Default Judgment.

Certificate of Mailing is attached.



I certify that this is a true and correct copy of the original on file in or issued from this office, consisting of 1 pages.

DAVID W. SLAYTON, Executive Officer / Clerk of the Superior Court of California, County of Los Angeles.

FEB 26 2025

M. Aguayo Deputy

M. Aguayo

CV-Certificate of Service (Service of Papers Other than Citation)

Instructions: Every notice, pleading, plea, motion, or request made to the court must be served on all other parties in person, by mail or courier, by fax, by e-mail with consent, or in another manner directed by the court. Pleadings and documents other than a citation may be served by a party to the suit, an attorney of record, a sheriff or constable, or any other person competent to testify.

Proof of such service must be evidenced by a certificate of service signed by a party or the party's attorney of record, or signed and verified if the service is made by any other person, and attached to the document filed with the Court. **Rule 501.4**

CERTIFICATE OF SERVICE

I certify that this document was served on all parties to this lawsuit as follows:

Name of Document: Amended Petition to Domesticate Foreign Judgment, Affidavit
Method of Service (include information for each party to the lawsuit served with the document): 1st Address

☐ **Personal Delivery:**

Name of Party or Party's attorney of record or agent, if any: _____

Address: _____

Date delivered: _____

Person delivering document: _____

☒ **Mail or Courier:**

Name of Party or Party's attorney of record or agent, if any: Blogger Inc / CIO Mark Burke

Address: 46 Kingwood Greens, Kingwood TX 77339

Date mailed: 04/11/25

Certified Mail Receipt No.: _____

Courier: UPS

129V38640391823868

Date of courier delivery: 04/12/25

Courier Receipt No.: 12504114495B048114

☐ **Fax**

Name of Party or Party's attorney of record or agent, if any: _____

Date and time fax sent: _____ Fax number: _____

☒ **Email**

Name of Party or Party's attorney of record or agent, if any: Andrew Lehman

Date and time email sent: 04/11/25 @ 12pm Email address: blog@bloggerinc.org

info@lawsintexas.com

Signed on 04/11/25

Signature of Party or Party's Attorney of Record

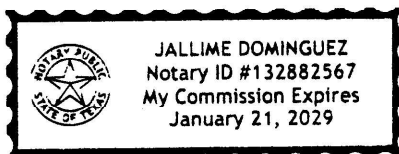
Signed on April 11th 2025

Signature of Person Providing Notice

(VERIFICATION REQUIRED IF SERVICE IS BY A PERSON OTHER THAN A PARTY OR PARTY'S ATTORNEY)

I declare under penalty of perjury that the information in this Certificate of Service is true and correct.

Signed on April 11th 2025 in Georgetown, County, Texas.



Signature of Person Providing Notice

Printed Name: Jallime Dominguez

Address: 6311 Stewart RD

Date of Birth: 9/24/96

CV-Certificate of Service (Service of Papers Other than Citation)

Instructions: Every notice, pleading, plea, motion, or request made to the court must be served on all other parties in person, by mail or courier, by fax, by e-mail with consent, or in another manner directed by the court. Pleadings and documents other than a citation may be served by a party to the suit, an attorney of record, a sheriff or constable, or any other person competent to testify.

Proof of such service must be evidenced by a certificate of service signed by a party or the party's attorney of record, or signed and verified if the service is made by any other person, and attached to the document filed with the Court. **Rule 501.4**

CERTIFICATE OF SERVICE

I certify that this document was served on all parties to this lawsuit as follows:

Name of Document: Amended Petition to Domesticate Foreign Judgment
Method of Service (include information for each party to the lawsuit served with the document): Affidavit Last Address

☐ **Personal Delivery:**

Name of Party or Party's attorney of record or agent, if any: _____
Address: _____
Date delivered: _____
Person delivering document: _____

☒ **Mail or Courier:**

Name of Party or Party's attorney of record or agent, if any: Agents & Corporations Inc Registered Agent
Address: 1201 N. Orange #600, Wilmington DE 19801 for Bloggers Inc
Date mailed: 04/11/25 Certified Mail Receipt No.: _____
Courier: UPS 129V38640391824385
Date of courier delivery: 04/16/25 Courier Receipt No.: _____

☐ **Fax**

Name of Party or Party's attorney of record or agent, if any: _____
Date and time fax sent: _____ Fax number: _____

☒ **Email**

Name of Party or Party's attorney of record or agent, if any: Andrew Lehman
Date and time email sent: 04/11/25 @ 12pm Email address: blog@bloggersinc.org
info@lawsintexas.com

Signed on 04/11/25

[Signature]
Signature of Party or Party's Attorney of Record

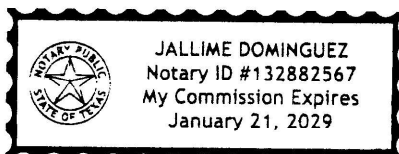
Signed on April 11th 2025

[Signature]
Signature of Person Providing Notice

(VERIFICATION REQUIRED IF SERVICE IS BY A PERSON OTHER THAN A PARTY OR PARTY'S ATTORNEY)

I declare under penalty of perjury that the information in this Certificate of Service is true and correct.

Signed on April 11th 2025 in Gaustan, County, Texas.



[Signature]
Signature of Person Providing Notice

Printed Name: Jallime Dominguez
Address: 6341 Stewart Rd
Date of Birth: 9/24/96

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

**AVISO: ESTE DOCUMENTO CONTIENE INFORMACIÓN
CONFIDENCIAL**

**Statement of Inability to Afford Payment
of Court Costs or an Appeal Bond**

**Declaración de Incapacidad Para Pagar los
Costos de la Corte o de una Fianza de Apelación**

Cause Number
Número de Caso

2025-14896

The Clerk's office will fill in the Cause Number when you file this form.

La oficina del Secretario del Tribunal anotará el Número de Caso cuando usted presente este formulario.

ANDREW LEHMAN , MONICA RILEY

v.

BLOGGER INC

Copy information listed at the top left of the petition here.

Copie aquí la información que aparece en la parte superior izquierda de la petición.

Copy information listed at the top right of the petition here.

Copie aquí la información que aparece en la parte superior derecha de la petición.

2025-14896

Court Number
Número del Tribunal

HARRIS, Texas

County
Condado

- ☒ District Court
Tribunal de Distrito
- ☐ County Court
Tribunal del Condado
- ☐ County Court at Law
Tribunal Estatutario
- ☐ Justice Court
Juzgado de Paz
- ☐ Probate Court
Juzgado Sucesorio

1. Your Information / Su Información

- My full legal name is / Mi nombre legal completo es

MONICA LYNN RILEY

First Middle Last / Primer Nombre Segundo Nombre Apellido

- My date of birth is / Mi fecha de nacimiento es

06-23-1998

Month Day Year / Mes Día Año

- My address is / Mi dirección es

Home / Domicilio

957 NASA PARKWAY # 1102, HOUSTON, TX 77058

Mailing / Dirección Postal

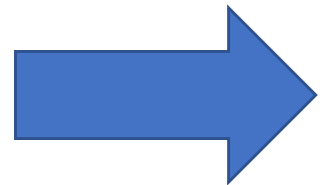
6140 HWY 6 S # 1160, MISSOURI CITY, TX 77459

- My phone number / Mi número telefónico 346-626-8530

- My email I check often / Mi correo electrónico que reviso con frecuencia

LEHMANMONICA25@GMAIL.COM

Go to next page



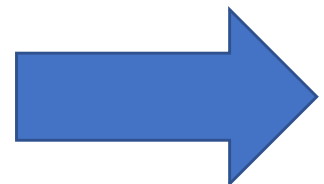
Pase a la página siguiente

2. About My Dependents / Mis Dependientes

“The people who depend on me financially are listed below.” **Use initials only for children under 18.** If needed, attach a separate piece of paper to list more dependents.

“Las personas que dependen de mi económicamente se anumeran a continuación” **Use iniciales para los menores de 18 años.** Si es necesario, adjunte una hoja separada para enumerar mas dependientes.

Name Nombre	Age Edad	Relationship to me Parentesco Conmigo
ANDREW LEHMAN, JR	1	SON



3. Are you represented by Legal Aid? ¿Está representado por asistencia legal?

Check only one box. Seleccione solo una caja

☐ I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as “Exhibit: Legal Aid Certificate.”

Estoy siendo representando en este caso de forma gratuita por un abogado que trabaja para un proveedor de asistencia legal o que recibió mi caso a través de un proveedor de asistencia legal. He adjuntado el certificado que el proveedor de asistencia legal me dio como “Prueba: Certificado de Asistencia Legal.”

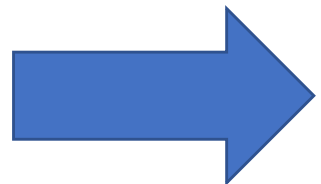
☐ or / o
I asked legal aid to represent me. Legal aid told me that I am financially eligible for help, but they could not take my case. I have attached a document from legal aid stating this.

Le pedí a una organización de asistencia legal que me representara. La asistencia legal me dijo que soy financieramente elegible para recibir ayuda, pero no pudieron tomar mi caso. He adjuntado un documento de asistencia legal gratuita en el que se afirma esto.

or / o

☒ I did not apply for legal aid.

No solicité asistencia legal.



4. Public Benefits / Beneficios de Asistencia Pública

- Do you or any of your dependents receive public benefits?
¿Usted o alguno de sus dependientes recibe beneficios públicos?

☒ Yes / Si

☐ No / No

- If you answered yes, check all that apply and attach proof to this form, such as a copy of an eligibility form or check.

Si respondió que sí, marque todas las cajas que apliquen y adjunte pruebas a este formulario, como una copia de un formulario de elegibilidad o una copia del cheque que recibe.

☒ Food stamps/SNAP
Cupones de comida/SNAP

☐ TANF

☐ Medicaid

☐ CHIP

☐ SSI/SSDI

☐ WIC

☐ Lifeline

☐ Public Housing or Section 8 Housing
Asistencia de Vivienda / Programa de
Vivienda bajo Sección 8

☐ Low-Income Home Energy
Assistance
Asistencia con Energía
Eléctrica

☐ Community Care via HHS
Ayuda Comunitaria bajo HHS

☐ LIS in Medicare ("Extra Help")
Subsidio Adicional de Medicare
bajo el Programa LIS

☐ Needs-based VA Pension
Pensión para Veteranos de Guerra en
función a necesidades

☐ Child Care Assistance under
Child Care and Development
Block Grant
Asistencia con Guardería bajo
el Programa CCDBG

☐ County Assistance, County Health
Care, or General Assistance (GA)
Asistencia del Condado, Asistencia
Médica del Condado, o Asistencia
General (GA)

☐ Other / Otros beneficios

☐ Other / Otros beneficios

5. What are your monthly income sources? ¿Cuáles son sus fuentes de ingresos mensuales?

➤ My take-home pay is \$ 0 in monthly wages.

Mi pago neto es \$ 0 en sueldo mensual.

➤ I work as a N/A (your job title) for N/A (your employer).

Yo trabajo como _____ (título de su puesto) para
_____ (compañía o jefe).

These are my other income sources. Estas son mis otras fuentes de ingresos.

➤ \$ N/A in unemployment / en beneficios de desempleo.

I have been unemployed since 11/01/2024 (date).

He estado desempleado desde _____ (indique fecha).

➤ \$ 0 in public benefits / en beneficios de Asistencia Pública.

➤ \$ 200 from people in my household other than my spouse / ingresos de otras personas en mi hogar que no son de mi cónyuge.

➤ \$ 0 from retirement or pension / de jubilación o pensión.

➤ \$ 0 from tips or bonus / de propinas o bonos.

➤ \$ 0 from disability / de discapacidad.

➤ \$ 0 from worker's comp / de compensación al trabajador.



- \$ 0 from social security / de seguro social.
- \$ 0 from military housing / de vivienda militar.
- \$ 0 from dividends, interest, or royalties / de dividendos, intereses, o regalías.
- \$ 0 from child or spousal support / de manutención de menores o manutención conyugal recibida.
- Answer only if your spouse is not your opponent. Responda sólo si su cónyuge no es parte contraria en esta causa legal.

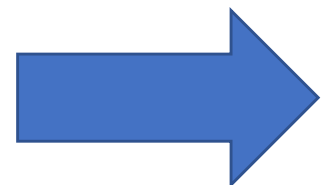
 \$ 0 from my spouse's income / ingresos de mi cónyuge.
- \$ 0 from other jobs/sources of income / de otros trabajos/fuentes de ingresos.

Describe / describa:

I AM CURRENTLY INCARCERATED IN THE GALVESTON
 COUNTY JAIL SINCE NOVEMBER 2024.

Total Monthly Income
Ingresos Mensuales Totales

\$ 200



6. What is the value of your assets or property? ¿Cuál es el valor de sus bienes o propiedades?	
My property includes: Mis bienes incluyen:	Value / Valor The value is the amount the item would sell for less the amount you still owe on it, if anything. El valor de sus bienes es la cantidad por la que la propiedad o pertenencia se vendería, menos la cantidad que aún debe por el, si acaso.
➤ Cash Dinero en efectivo	\$ 0
➤ Bank accounts, other financial assets Cuentas bancarias, otros bienes financieros	
N/A	\$ 0
	\$
	\$
➤ Cars and boats (make and year) Automóviles, lanchas (modelo y año)	
N/A	\$ 0
	\$
	\$
➤ Other property like jewelry, stocks, land, a second house. (Do not list your homestead.) Otros bienes como joyas, acciones, terrenos, una segunda casa. (No indique su hogar familiar.)	
N/A	\$ 0
	\$
	\$
Total Value of Property Valor Total de Sus Bienes	\$ 0



7. What are your monthly expenses that are not deducted from your paycheck? ¿Cuáles son sus gastos mensuales que no se deducen de su cheque de sueldo?	
My monthly expenses are: Mis gastos mensuales son:	Amount Cantidad
➤ Rent/house payments; maintenance Alquiler/hipoteca; mantenimiento de casa	\$ 0
➤ Food and household supplies Alimentos y artículos para el hogar	\$ 200
➤ Utilities and telephone Luz, gas, agua y teléfono	\$ 0
➤ Clothing and laundry Ropa y lavado de ropa	\$ 0
➤ Medical and dental expenses Gastos médicos y dentales	\$ 0
➤ Insurance (life, health, auto, etc.) Seguros (de vida, médico, de automóvil etc.)	\$ 0
➤ School and childcare Escuelas y cuidado de los niños	\$ 0
➤ Transportation, auto repair, gas Transportación, reparaciones de automóviles, gasolina	\$ 0
➤ Child/Spousal support Manutención a Menores/Manutención Conyugal	\$ 0
➤ Debt payments to (list): Pagos por deudas hechas a (indíquelos):	
	\$
	\$
➤ Wages withheld by court order Sueldo retenido por orden judicial	\$ 0
➤ Other expenses (list): Otros gastos (indíquelos):	
	\$
	\$
Total Monthly Expenses Gastos Totales Mensuales	\$ 200



8. Are there debts or other facts explaining your financial situation? ¿Hay deudas o otros factores que expliquen su situación económica?

My debts include (list debt and amount owed):

Mis deudas incluyen (indique deuda y la cantidad que debe):

	\$
	\$
	\$
	\$
	\$

If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts."

Si desea que la corte considere otros factores, como gastos médicos excepcionales, emergencias familiares, etc., adjunte otra página a este formulario con la etiqueta "Exhibición: Hechos de Apoyo Adicionales".

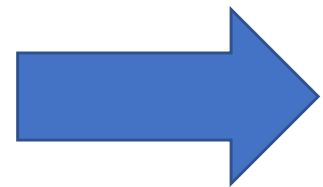
9. Ability to Pay Court Costs. Declaración de Capacidad Para Pagar Costos del Tribunal

Check only one box. Seleccione tan solo una caja.

☒ I cannot afford to pay court costs. No puedo pagar las costas de tribunal.

☐ I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision, and I cannot afford to pay court costs.

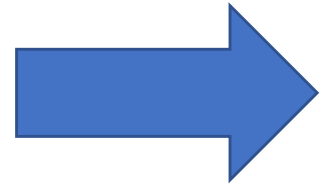
No puedo aportar una fianza de apelación ni pagar un depósito en efectivo para apelar la decisión judicial de un magistrado, y no puedo pagar costas de tribunal.



10. Declaration/Affidavit. Declaración Escrita Bajo Juramento.

Fill out only one box. If you fill out the Declaration (Option 1), you will not need to sign the form in front of a notary public. If you do not want to list your address for privacy or safety concerns, take the form and photo identification, and fill out the Affidavit box (Option 2) in front of a notary public.

Llene solo una opción. Si usted llena la Declaración (Opción 1), no necesitará firmar el formulario ante un notario. Si usted no quiere que aparezca su domicilio en el documento para conservar su privacidad o por motivos de su seguridad, lleve el formulario y una identificación con fotografía y llene la sección de la Declaración Escrita Bajo Juramento (Opción 2) ante un Notario.



Option 1 / Opción 1

Declaration: I declare under penalty of perjury that the foregoing is true and correct.

Declaración: Yo declaro bajo pena de perjurio que lo anterior es cierto y correcto.

➤ My name is / Mi nombre es

MONICA LYNN RILEY

➤ My date of birth is / Mi fecha de nacimiento es

06 / 23 / 1998

➤ My address is / Mi domicilio es

6140 HWY 6 S # 1160, MISSOURI CITY, TX 77459

Street, city, zip, country

Calle y número, ciudad, estado, código postal, país

➤ /s/ MONICA LYNN RILEY

Signature

Firma

➤ 04/11/2025

Date (month, day, year)

Fecha (mes, día, año)

➤ GALVESTON, TX

County, state

Condado, estado



Option 2 / Opción 2

Affidavit: I swear under penalty of perjury that the foregoing is true and correct.

Declaración Escrita Bajo Juramento: Yo juro bajo pena de perjurio, que lo que precede es cierto y correcto.

You fill out this section. Do not sign until you are in front of a notary.

Usted llena esta sección. No firme hasta que esté en frente de un notario.



Your printed name
Su nombre impreso



Your signature
Su firma

The notary fills out this section.

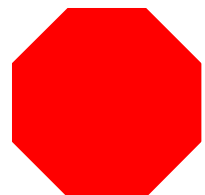
El Notario llena esta sección.



Subscribed before me this day of
Juramentado y suscrito ante mí el día de hoy del mes de

_____, 20____

NOTARY
NOTARIO



1. Jurisdiction: The foreign judgment is within the scope of Texas Civil Practice and Remedies Code Chapter 35, which governs the domestication of foreign judgments. The Court has jurisdiction over the parties and the subject matter of this action.
2. Notice: The Defendant, BLOGGER INC d/b/a www.lawsintexas.com, was duly notified of the Amended Petition for Domestication of Foreign Judgment in accordance with Texas Civil Practice and Remedies Code §35.003; as evidenced by first class mail sent to the Defendant on April 11, 2025, Certificate of Service on file with this court.
3. No Objection/Defendant's Failure to Respond: [OR] Defendant having failed to timely contest the Petition and the time for doing so having expired, the foreign judgment meets the requirements for recognition under Texas law.
4. Recognition of Foreign Judgment: The foreign judgment meets all necessary criteria under Texas law for recognition and domestication, including that the foreign court had proper jurisdiction, the judgment was final, and the judgment is not contrary to Texas public policy.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that:

1. Domestication: The foreign judgment entered by the Superior Court of California, County of Los Angeles, Civil Division, Central District, Stanley Mosk Courthouse, Department 37, located at 111 North Hill Street, Los Angeles, CA 90012, Honorable Judge Gail Killefer, Cause No. 23STCV00341, dated December 2, 2024, in the amount of \$1,991,194.12, in favor of Plaintiff ANDREW LEHMAN & MONICA RILEY against Defendant BLOGGER INC, d/b/a www.lawsintexas.com, which includes injunctive relief ordering this defendant BLOGGER INC d/b/a www.lawsintexas.com, to remove false, malicious, and defamatory online publications concerning the plaintiff's ANDREW

LEHMAN, and MONICA RILEY; is hereby domesticated and recognized as a judgment of this Court.

2. Effect of Domestication: The domesticated judgment shall have the same force and effect as a judgment entered by a Texas court, and Plaintiffs may take all actions necessary to enforce the judgment, including but not limited to, the filing of writs of execution, garnishment, or other enforcement mechanisms as authorized under Texas law.
3. Costs: Defendant is ordered to pay the costs of this proceeding, including any filing fees and service fees associated with the Amended Petition for Domestication.
4. Post-Judgment Interest: The judgment shall accrue post-judgment interest at the rate of 5% from the date of this Order until the judgment is fully satisfied.

SIGNED this _____, day of _____; 2025.

Honorable Judge of the District Court

EXECUTED THIS 11th DAY OF APRIL 2025 at HARRIS COUNTY.

/S/ ANDREW LEHMAN

Andrew Lehman
Plaintiff Pro Se
957 Nasa Parkway
Houston TX 77058
713-903-9690
Lehmanlaw2002@gmail.com

/S/ MONICA RILEY

Monica Riley
Plaintiff Pro Se
6140 HWY 6 S # 1160
Missouri City, TX 77459
346-626-8530
Lehmanmonica25@gmail.com

EXHIBIT “A”

CORRESPONDENCE TO DEFENDANT

ON APRIL 5, 2025.



A.P. Lehman <lehmanlaw2002@gmail.com>

2025-14896-Certificate of Conference - AMENDED PETITION FOR DOMESTICATION OF FOREIGN JUDGMENT

A.P. Lehman <lehmanlaw2002@gmail.com>

Sat, Apr 5, 2025 at 4:03 AM

To: Blogger Inc <blog@bloggerinc.org>, browserweb@gmail.com, info@lawsintexas.com,
"A.P. Lehman" <lehmanlaw2002@gmail.com>

Blogger:

I intend on filing an Amended Petition to Domestic a Foreign Judgment in this matter 2025-14896, and want to advise you of the same and ask if you oppose the filling of said Amended petition.?

Please advise.

ANDREW LEHMAN, J.D.

Certified Contract Advisor NFLPA, NBPA,

Athlete Agent License (TX)(LA)(FL) (Surety Bond \$100,000.00)

Professional Malpractice Insurance \$1,000,000.00

Legal LDA License (CA) (Surety Bond \$25,000.00)

Credit Services Organization (TX) (Surety Bond \$10,000.00)

(1) 7190 W Sunset Blvd., Suite 237, Hollywood, CA 90046

(2) 584 Castro Street, Suite 500, San Francisco, CA 94114

(3) 5201 Blue Lagoon, Suite 300, Miami, FL 33126

www.aequitaslda.com; 510-375-0316; www.lehmandata.com

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herein, is strictly prohibited.

PLATINUM TAX RELIEF INC.

Chief Financial Officer / Board Member

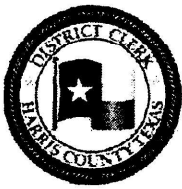
Internal Revenue Service Lic P03010527 ; CAF 0315 - 23289R

(1) 4520 Centennial Blvd., Suite 1061, Colorado Springs, CO 80919

(2) 500 4rth Street NW, Suite 1100, Albuquerque, NM 87102

www.platinumtaxrelief.com; 713-903-9690

IRS Circular 230 Notice: This written advice (including any attachments) is not intended or written to be used, and cannot be used by any taxpayer, for the purpose of avoiding penalties that may be imposed on the taxpayer.



Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

CASE NUMBER: 2025-14896 Request for Issuance of Service
CURRENT COURT: 215th

Name(s) of Documents to be served: Amended Petition to Domesticate Foreign Judgment

FILE DATE: 04/11/2025 Month/Day/Year Affidavit of Last Known Address
Certificate of Conference

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be

Served):

Issue Service to: Blogger Inc

Address of Service: 1201 N. Orange #600

City, State & Zip: Wilmington DE 19801

Agent (if applicable) Agents & Corporations Inc Registered Agent

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

- ☒ Citation ☐ Citation by Posting ☐ Citation by Publication ☐ Citations Rule 106 Service
- ☐ Citation Scire Facias Newspaper _____
- ☐ Temporary Restraining Order ☒ Precept ☒ Notice
- ☐ Protective Order
- ☐ Secretary of State Citation (\$12.00) ☐ Capias (not by E-Issuance) ☐ Attachment (not by E-Issuance)
- ☐ Certiorari ☐ Highway Commission/Texas Department of Transportation (\$12.00)
- ☐ Commissioner of Insurance (\$12.00) ☐ Hague Convention (\$16.00) ☐ Garnishment
- ☐ Habeas Corpus (not by E-Issuance) ☐ Injunction ☐ Sequestration
- ☐ Subpoena
- ☐ Other (Please Describe) _____

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP (phone) _____
- ☐ MAIL to attorney at: _____
- ☐ CONSTABLE
- ☐ CERTIFIED MAIL by CONSTABLE
- ☐ CERTIFIED MAIL by DISTRICT CLERK

☒ E-Issuance by District Clerk
(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-issuance Service Documents.
Visit www.hcdistrictclerk.com for more instructions.

- ☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____
- ☐ OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Andrew Lehman Bar # or ID 09843320

Mailing Address: 957 NASA Parkway Houston TX 77058

Phone Number: 713 903 9690