	ş	CASE NO. 2025-14896
ANDREW LEHMAN, MONICA RILEY	\$ \$ 8	HARRIS COUNTY
Plaintiffs,	5 § 8	215^{TH} DISTRICT COURT
v.	\$ \$	PLAINTIFFS' MOTION FOR
BLOGGER INC, a Delaware 501(c)(3)	\$ \$ \$	ENFORCEMENT AND MOTION FOR CONTEMPT AGAINST DEFENDANT
Not for profit Corporation operating its Principal office in Texas	ş	BLOGGER INC AND ITS OWNER MARK BURKE,
Defendant,	§ § §	AFFIDAVIT OF NON COMPLIANCE WITH COURT ORDERS
	ş	

PLAINTIFFS' MOTION FOR ENFORCEMENT AND MOTION FOR CONTEMPT AGAINST DEFENDANT BLOGGER INC. AND ITS OWNER MARK BURKE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Andrew Lehman and Monica Riley, Plaintiffs in the above-styled and numbered cause, and file this Motion for Enforcement and Motion for Contempt against Defendant Blogger Inc., and respectfully request contempt sanctions against its owner, Mark Burke, and in support would show the Court the following:

I. BACKGROUND

 On March 5, 2025, Plaintiffs' served the Defendant with Notice of Domestication of Foreign Judgment in this matter, and on April 15, 2025, this Court Domesticated the Final Judgment of the Los Angeles Superior Court, dated December 12, 2024, in favor of Plaintiffs and against Defendant Blogger Inc. The judgment included clear and specific injunctive relief ordering the removal of eighteen (18) specific defamatory articles from websites controlled by Blogger Inc.

- A list of the defamatory articles subject to removal is attached hereto as Exhibit A.
- 3. Defendant Blogger Inc. was properly served with the Final Judgment and the Notice of Domestication of Foreign Judgment and Defendant has had ample time to comply. However, the defamatory content remains publicly accessible online, and no meaningful effort has been made to remove it.
- 4. Mark Burke, as the owner, operator, and controlling agent of Blogger Inc., has actual knowledge of the Court's judgment and is the individual with the power and authority to effect compliance with the Court's order.
- 5. Despite multiple written demands and notice of the Final Judgment, Mark Burke has knowingly and willfully failed to cause Blogger Inc. to comply and has allowed the continued publication of the defamatory content in violation of the Court's order, while publishing additional defamatory articles about Plaintiffs' even after the date that this court domesticated the Foreign Judgment against Defendant.

II. REQUEST FOR ENFORCEMENT

- 6. Plaintiffs request that this Court enforce the Final Judgment against Defendant Blogger Inc by compelling Blogger Inc. to immediately remove the online defamatory articles identified in Exhibit A and take all necessary steps to ensure they are no longer accessible to the public.
- 7. Plaintiffs further request that this Court authorize issuance of any writs or orders necessary to achieve compliance and protect Plaintiffs from further harm that this court has recognized as financial damages to the Plaintiffs' and their businesses in an amount of \$1,992,115.12.

III. REQUEST FOR CONTEMPT AND SANCTIONS

- 8. Plaintiffs request that this Court hold Blogger Inc. in civil contempt for willfully violating the Court's Final Judgment.
- 9. Plaintiffs further request that the Court find that Mark Burke, although not a named defendant, is subject to contempt sanctions because he:
 - Has actual notice of the judgment,
 - \circ Has personal control over Blogger Inc. and the offending content, and
 - Has intentionally refused to comply with the Court's clear order.
- 10. Plaintiffs request that the Court issue a Show Cause Order requiring Mark Burke to personally appear before this Court to explain why he should not be held in civil contempt, and face sanctions including:
- Coercive incarceration until compliance is achieved,

PLAINTIFFS' MOTION FOR ENFORCEMENT AND CONTEMPT

- Monetary sanctions, and
- Attorney's fees and court costs incurred by Plaintiffs in bringing this motion.

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Andrew Lehman and Monica Riley respectfully pray that this Court:

- 1. Enforce the Final Judgment previously entered against Blogger Inc.;
- 2. Hold Blogger Inc. in civil contempt and impose appropriate sanctions and/or fines.
- 3. Order Mark Burke to appear and show cause why he should not be held in contempt for knowingly enabling the ongoing violation of the Court's judgment.
- 4. Award reasonable attorney's fees and court costs incurred in the enforcement of this judgment; and
- Grant such other and further relief, at law or in equity, to which Plaintiffs may be justly entitled.

Respectfully submitted,

/s/ ANDREW LEHMAN

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

/s/ MONICA RILEY

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

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 101480783 Filing Code Description: Motion for Contempt Filing Description: MOTION FOR ENFORCEMENT MOTION FOR CONTEMPT ON DEFENDANT BLOGGER INC AND ITS OWNER MARK BURKE Status as of 6/2/2025 9:39 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mark Burke		browserweb@gmail.com	6/2/2025 9:06:40 AM	SENT
ANDREW P.LEHMAN		lehmanlaw2002@gmail.com	6/2/2025 9:06:40 AM	SENT
MONICA LYNNRILEY		lehmanmonica25@gmail.com	6/2/2025 9:06:40 AM	SENT

	ş	CASE NO. 2025-14896
ANDREW LEHMAN, MONICA RILEY	\$ \$	HARRIS COUNTY
Plaintiffs,	\$ \$ \$	215 TH DISTRICT COURT
v. BLOGGER INC, a Delaware 501(c)(3) Not for profit Corporation operating its Principal office in Texas Defendant,	\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$	AFFIDAVIT OF DEFENDANTS NON-COMPLIANCE WITH THIS COURTS ORDERS
STATE OF TEXAS §		

COUNTY OF HARRIS §

AFFIDAVIT OF NON-COMPLIANCE

BEFORE ME, the undersigned authority, on this day personally appeared [Your Name], who, being duly sworn, deposed and stated as follows:

1. My name is ANDREW LEHMAN and I am a Plaintiff in the above-entitled and numbered cause.

2. I have personal knowledge of the facts stated herein and am competent to testify to the same.

3. 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

AFFIDAVIT OF DEFENDANTS NON COMPLIANCE WITH COURT ORDERS

\$1,992,994.16, and equitable relief for the Plaintiff[s] ordering the removal of eighteen (18) specific defamatory articles from websites controlled by Defendant containing false, libelous, tortious, defamatory internet postings and blogs on the Defendant's wholly owned website <u>www.lawsintexas.com</u>.

4. On March 5, 2025, Plaintiffs' served the Notice of Domestication of the Foreign Judgment with a certified Copy of the Foreign Judgment on the Defendant Blogger Inc, filing a copy of the petition for Domestication of Foreign Judgment in the 215th District Court of Harris County, Texas, ordering the removal of eighteen (18) specific defamatory articles from websites controlled by Defendant.

5. On April 15, 2025, in the 215th District Court of Harris County herein, the court confirmed the order for domestication of the foreign judgment in this court ordering the removal of eighteen (18) specific defamatory articles from websites controlled by Defendant, and payment of monetary damages of \$1,992,114.12 to be paid to the Plaintiffs' for the serious damages done to these plaintiffs and their businesses.

6. A true and correct list of the defamatory articles subject to removal is attached hereto as Exhibit 1.

7. Despite proper service of the Final Judgment and written demands for compliance, Defendant Blogger Inc. has failed and refused to remove the defamatory articles, which remain publicly accessible online. 8. Mark Burke is the owner, operator, and controlling agent of Blogger Inc., and has actual knowledge of the Final Judgment and its requirements.

9. Mark Burke has personal control and authority over Blogger Inc.'s online content and has willfully failed to cause compliance with the Court's order, resulting in continued defamation of Plaintiffs.

10. To the best of my knowledge, the Defendant's failure to comply is willful and constitutes contempt of this Court's Final Judgment.

FURTHER AFFIANT SAYETH NOT.

andrew Lehman

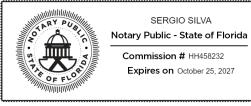
ANDREW LEHMAN Plaintiff Pro Se 957 Nasa Parkway 1102 Houston, TYX 77058 713-903-9690 Lehmanlaw2002@gmail.com

SUBSCRIBED AND SWORN TO BEFORE ME on this <u>2nd</u> day of <u>June</u>, 2025.

Notary Public in and for the State of TEXXX Florida



My Commission Expires: <u>10/25/2027</u>



Notarized remotely online using communication technology via Proof.

AFFIDAVIT OF DEFENDANTS NON COMPLIANCE WITH COURT ORDERS

EXHIBIT "1"

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 <u>lawintexas.com</u>:

a. <u>https://lawsintexas.com/threatening-journalists-thug-without-a-jd-sentenced-to-27- months-jail-by-federal-judge-talwani/</u>

b. <u>https://lawsintexas.com/thug-with-a-jd-andrew-lehmans-articles-triggered-a-</u> <u>reaction- from-indicted-and-incarcerated-chris-badsey/</u>

c. https://lawsintexas.com/lehman-data-analytics-2024/

d. <u>https://lawsintexas.com/the-war-on-whistleblowers/</u>

e. https://<u>lawsintexas.com/lisa-mills-is-attempting-to-evict-scary-andrew-</u> <u>lehman-from</u>her-magnolia-residence/

f. <u>https://lawsintexas.com/take-2-attomey-chris-gregg-falsely-refuses-pia-request-incontinued-blackballin-of-lit-by-texas-gov-entities/</u>

g. <u>https://lawsintexas.com/transparency-in-question-harris-county-attomeys-</u> <u>officerejects-open-records-reguest -in-high-stake-cases/</u> h. <u>https://lawsintexas.com/the-cfpb-claim-3m-restitution-from-forensic-loan-scam-cothe-fact-is-the-3 m-is-suspended-these-two-thieves-should-be-in-j ail/</u>

I. https://<u>lawsintexas.com/</u>gcso-bodycam-withheld-after-attempted-murder-of-patrickcline-by-andrew-lehman-in-galveston/

j. $https://\underline{lawsintexas.com/2}022\text{-ends-with-investigation-into-and rew-p-lehman-cflalehman-brothers-llc-lehman-data-analtyics-et-al/}$

k. <u>https://lawsintexas.com/tag/</u>certified-forensic-loan-auditors-Uc/

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

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

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.

	ş s	CASE NO. 2025-14896
ANDREW LEHMAN, MONICA RILEY	s S	HARRIS COUNTY
Plaintiffs,	s Ş S	215 TH DISTRICT COURT
v .	ş	
	ş	PROPOSED ORDER
BLOGGER INC, a Delaware 501(c)(3)	§ 8	
Not for profit Corporation operating its	ş	
Principal office in Texas	§	
Defendant,	ş	
Derendant,	8 §	
	ş	

PROPOSED ORDER ON PLAINTIFFS' MOTION FOR ENFORCEMENT AND CONTEMPT

On this day, the Court considered Plaintiffs' Motion for Enforcement and Motion for Contempt against Defendant Blogger Inc. and its owner, Mark Burke. After reviewing the motion, evidence, and arguments, the Court finds the motion should be GRANTED in part.

IT IS HEREBY ORDERED THAT:

 Defendant Blogger Inc. is in civil contempt of this Court for willfully failing to comply with the Final Judgment entered on [insert date].

- 2. Blogger Inc. is ORDERED to remove the eighteen (14) defamatory articles identified in Exhibit 1 from all websites and online platforms under its control within five (5) days from the date of this order.
- 3. Mark Burke, owner and controlling agent of Blogger Inc., is ORDERED to appear before this Court on [insert date and time] to show cause why he should not be held in civil contempt and subject to sanctions, including incarceration, for willful disobedience of the Court's Final Judgment.
- 4. Plaintiffs are AWARDED their attorney's fees and costs related to this enforcement proceeding, subject to proof.

SIGNED on the ____ day of _____, 2025.

JUDGE PRESIDING 215th District Court Harris County, Texas

REQUEST FOR ABSTRACT OF JUDGMENT	
Date: 16 102 2025	ä
Please process this request to have Judgment against the Defendant/Respondent abstracted. is to be stated on the abstract.	The information below

CAUSE NUMBER: $2025/4896$	JUDICIAL DISTRICT COURT: $\frac{2}{3}/5$
STYLE: Andrew Lohman et ol	
V\$.	Kny 1102, Houston TX 7058
Debtor's last known address: <u>46 Kincywood</u>	Greens, Kingwood TX 77339
Debtor's Date of Birth: 06/20/1967	
Debtor's Social Security No:	19
Date of Judgment: Apr, 7 15, 2025	
Amount of Judgment: \$ 1,992,994.16	
Judgment Credit, if any:	
Number of Abstracts requested:	
Requested by:	
Law Firm:	
Attorney: Andrew Cchmon	
Bar Number:	
Address: <u>957</u> Nasa Pkw	y 1102
Housten 7 City	X 77058 State Zip
Phone Number: <u>713</u> 903 96	90
HOLD FOR PICKUP	RETURN BY MAIL (SEE BELOW)

Please submit this request along with an \$8.00 fee plus postage to MARILYN BURGESS Clerk; (P.O. Box 4651 Houston, Texas 77210-4651) Pro Se Filers only. No personal checks.

According to The Supreme Court of Texas, an order was signed adopting Texas Rule of Civil Procedure 21c and Amendments to Texas Rules of Civil Procedure 4, 21, 21a, and 502.1, Texas Rules of Appellate Procedure 6 and 9, and the Supreme court Order Directing the Form of the Appellate Record in Civil Cases to be effective January 1, 2014 for Harris County. This order mandates electronic filing in all Civil Courts and restricts us from accepting paper filing from any filer other than Pro Se filers.

This form can be found on our website at <u>www.hcdistrictclerk.com</u> Revised 3/3/2014

§	CASE NO. 2025-14896
9 § 8	HARRIS COUNTY
s S	215 TH DISTRICT COURT
§ 8	DECLARATION OF
s S	PLAANTIFF ANDREW
9 §	LEHMAN REGARDING DEFENDANT BLOGGER INCS
§ s	CORPORATE RESPONSIBILITY
s §	RESPONSIBILIT I
§	
9 §	
	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

#### DECLARATION OF CORPORATE RESPONSIBILITY

1. My name is ANDREW LEHMAN and I am a Plaintiff in the above-entitled and numbered cause.

2. I have personal knowledge of the facts stated herein and am competent to testify to the same.

3. Attached as Exhibit "1" is a true and correct copy downloaded from the Internal Revenue Service's website of the annual form 990's for years 2021, 2022, 2023, and 2024; all listing MARK BURKE as the principal Office of Blogger Inc, with the business address as the home address of Mark Burke; 46 Kingwood greens, Kingwood, TX 77339

# I SWEAR THAT THE FOREGOING FACTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWEDGE UNDER PENALTY OF PERJURY IN THE STATE OF

#### DECLARATION REGARDING BLOGGER INC CORPORATE RESPONSIBILITY

# **Blogger Inc.**

EIN: 85-1940437 | Kingwood, Texas, United States

## **Other Names**

**BLOGGER INC** 

## Form 990-N (e-Postcard)

Organizations who have filed a 990-N (e-Postcard) annual electronic notice. Most small organizations that receive less than \$50,000 fall into this category.

#### Tax Year 2024 Form 990-N (e-Postcard)

**Tax Period:** 2024 (05/01/2024-04/30/2025)

**EIN:** 85-1940437

**Organization Name (Doing Business as):** BLOGGER INC

**Mailing Address:** 46 Kingwood Greens Dr Kingwood, TX 77339 United States

Principal Officer's Name and Address:

MARK BURKE

46 Kingwood Greens Dr Kingwood, TX 77339 United States

**Gross receipts not greater than:** \$50,000

**Organization has terminated:** No

Website URL:

#### Tax Year 2023 Form 990-N (e-Postcard)

**Tax Period:** 2023 (05/01/2023-04/30/2024)

**EIN:** 85-1940437

**Organization Name (Doing Business as):** BLOGGER INC

**Mailing Address:** 46 Kingwood Greens Dr Kingwood, TX 77339 United States

Principal Officer's Name and Address:

Mark Burke

46 Kingwood Greens Dr Kingwood, TX 77339 United States

**Gross receipts not greater than:** \$50,000

**Organization has terminated:** No

Website URL: bloggerinc.org

#### Tax Year 2020 Form 990-N (e-Postcard)

**Tax Period:** 2020 (05/01/2020-04/30/2021)

**EIN:** 85-1940437

**Organization Name (Doing Business as):** BLOGGER INC

#### Mailing Address:

46 Kingwood Greens Dr Kingwood, TX 77339 United States

Principal Officer's Name and Address:

Mark Burke

Tax Exempt Organization Search Details | Internal Revenue Service

46 Kingwood Greens Dr Kingwood, TX 77339 United States

**Gross receipts not greater than:** \$50,000

**Organization has terminated:** No

Website URL:

### Tax Year 2019 Form 990-N (e-Postcard)

**Tax Period:** 2019 (05/01/2019-04/30/2020)

**EIN:** 85-1940437

**Organization Name (Doing Business as):** BLOGGER INC

Mailing Address: 46 Kingwood Greens Dr

Kingwood, TX 77339 United States

#### **Principal Officer's Name and Address:**

Mark Burke

46 Kingwood Greens Dr Kingwood, TX 77339 United States

**Gross receipts not greater than:** \$50,000

**Organization has terminated:** No

Website URL: bloggerinc.org

# TEXAS AND IF I AM CALLED AS A WITNESS TO THESE FACTS I WILL TESTIFY AS TO THE TRUTHFULNESS THEREIN.

#### /s/ ANDREW LEHMAN

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