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February 5, 2008


**See Attached Service List
Via Regular Mail and/or Electronic Mail**

**RE: RSMB&G v. SHAC, et al.
Docket No.: BER-C-337-07
Our File No.: C17226**

Dear Sir/Madam:

Enclosed herein please find copies of two orders signed by the Honorable Judge Peter E. Doyne, J.S.C. on February 4, 2008, which permanently enjoin defendants from engaging in certain actions.

Please be guided accordingly.

Very truly yours,

David P. Wadyka

FEB 04 2008

Peter E. Doyne, P.J.Ch.

Our File No: C17226

DiFRANCESCO, BATEMAN, COLEY, YOSPIN,
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Attorneys for plaintiff Rotenberg Meril Solomon Bertiger & Guttilla, P.C.

ROTENBERG MERIL SOLOMON
BERTIGER & GUTTILLA, P.C.,

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION: BERGEN COUNTY

Plaintiff,

: DOCKET NO: BER-C-337-07

v.

CIVIL ACTION

STOP HUNTINGDON

ORDER

ANIMAL CRUELTY, a/k/a SHAC;
WIN ANIMAL RIGHTS, a/k/a WAR;
NICHOLAS COONEY, a/k/a NICK
COONEY; HUGS FOR PUPPIES;
CLOSE HLS; BOSTON ANIMAL
DEFENSE LEAGUE, a/k/a BADL;
LONG ISLAND ANIMAL DEFENSE
LEAGUE, a/k/a ADL-LI; TAUNTON
ANIMAL RIGHTS ACTIVISTS, a/k/a
TARA; NEW JERSEY ANARCHISTS
AGAINST HLS; HLS SUCKS;
JONATHAN GRINDELL; ROBERT
HOLMES; TAMARA MATHESON;
LAUREN PERLSTEIN; DAVID
SILVERBERG; JONATHAN
STEPANIAN; ANDREW VILAINE;
MATTHEW PULGRANO; STEVERY
HOMER; HOLLY GARDNER; JODI
HUTCHINSON; JORDAN RUBIN;
CHRISTINE TONNER; ERIC
SULLIVAN; ALAN CERBORINO; TARA
CARIELLO; LINDSAY BELLARD;
ESTHER GREENWOOD; DAVID
FLOYD; JANE DOES, 5-100, NAMES
BEING FICTITIOUS; and RICHARD
ROES, 5-100, NAMES BEING
FICTITIOUS,

Defendants.


THIS MATTER having been opened to the Court upon the application of DiFrancesco, Bateman, Coley, Yospin, Kunzman, Davis & Lehrer, P.C., (David P. Wadyka, Esq., appearing), attorneys for plaintiff Rotenberg Meril Solomon Bertiger & Guttilla, P.C. ("RMSB&G"); and upon the consent of the four defendants represented by counsel, Lauren Perlstein, Matthew Pulgrano, Tara Cariello, and Lindsay Bellard (Stephen M. Latimer, Esq., appearing), and the remaining defendants, Stop Huntingdon Animal Cruelty, a/k/a SHAC, Win Animal Rights, a/k/a WAR, Nicholas Cooney, a/k/a Nick Cooney; Hugs For Puppies, Close HLS, Boston Animal Defense League, a/k/a BADL, Long Island Animal Defense League, a/k/a ADL-LI, Taunton Animal Rights Activists, a/k/a TARA, New Jersey Anarchists Against HLS, HLS Sucks, Jonathan Grindell, Robert Holmes, David Silverberg, Jonathan Stepanian, Andrew Vilaine, Stevery Homer, Holly Gardner, Jodi Hutchinson, Christine Tonner, Alan Cerborino, Esther Greenwood, David Floyd, Jane Does 5-100 and Richard Roes 5-100, Names Being Fictitious, having been notified of the within application and failing to respond or object, and the Court having considered the plaintiff's Verified Complaint, and the two Amended Verified Complaints, the Certifications annexed thereto, and brief in support thereof; and the Court having provided an opportunity for the parties to be heard; and for other good cause having been shown;

IT IS on this 4th day of February, 2008;

ORDERED that good cause has been shown to enter an order permanently imposing the restraints and relief granted in the order for preliminary injunctive relief filed by this Court on January 10, 2008; and.

IT IS FURTHER ORDERED that plaintiff shall serve true copies of this Order upon defendants within 7 days from the date hereof.

The case is
hereby
dismissed.



HON. PETER E. DOYNE, P.J.S.Ch.

No objection to
join as entry

FILED

FEB 04 2008

Peter E. Doyne, P.J.Ch.

Our File No: C17226

DiFRANCESCO, BATEMAN, COLEY, YOSPIN,
KUNZMAN, DAVIS & LEHRER, P.C.

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Attorneys for plaintiff Rotenberg Meril Solomon Bertiger & Guttilla, P.C.

ROTENBERG MERIL SOLOMON
BERTIGER & GUTTILLA, P.C.,

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION: BERGEN COUNTY

Plaintiff,

: DOCKET NO: BER-C-337-07

v.

CIVIL ACTION

STOP HUNTINGDON
ANIMAL CRUELTY, a/k/a SHAC;
WIN ANIMAL RIGHTS, a/k/a WAR;
NICHOLAS COONEY, a/k/a NICK
COONEY; HUGS FOR PUPPIES;
CLOSE HLS; BOSTON ANIMAL
DEFENSE LEAGUE, a/k/a BADL;
LONG ISLAND ANIMAL DEFENSE
LEAGUE, a/k/a ADL-LI; TAUNTON
ANIMAL RIGHTS ACTIVISTS, a/k/a
TARA; NEW JERSEY ANARCHISTS
AGAINST HLS; HLS SUCKS;
JONATHAN GRINDELL; ROBERT
HOLMES; TAMARA MATHESON;
LAUREN PERLSTEIN; DAVID
SILVERBERG; JONATHAN
STEPANIAN; ANDREW VILAINE;
MATTHEW PULGRANO; STEVERY
HOMER; HOLLY GARDNER; JODI
HUTCHINSON; JORDAN RUBIN;
CHRISTINE TONNER; ERIC
SULLIVAN; ALAN CERBORINO; TARA
CARIELLO; LINDSAY BELLARD;
ESTHER GREENWOOD; DAVID
FLOYD; JANE DOES, 5-100, NAMES
BEING FICTITIOUS; and RICHARD
ROES, 5-100, NAMES BEING
FICTITIOUS,

ORDER FOR PERMANENT
INJUNCTIVE RELIEF

Defendants.

THIS MATTER having been opened to the Court upon the application of DiFrancesco, Bateman, Coley, Yospin, Kunzman, Davis & Lehrer, P.C., (David P. Wadyka, Esq., appearing), attorneys for plaintiff Rotenberg Meril Solomon Bertiger & Guttilla, P.C. ("RMSB&G"); and defendants, Stop Huntingdon Animal Cruelty, a/k/a SHAC, Win Animal Rights, a/k/a WAR, Nicholas Cooney, a/k/a Nick Cooney; Hugs For Puppies, Close HLS, Boston Animal Defense League, a/k/a BADL, Long Island Animal Defense League, a/k/a ADL-LI, Taunton Animal Rights Activists, a/k/a TARA, New Jersey Anarchists Against HLS, HLS Sucks, Jonathan Grindell, Robert Holmes, Tamara Matheson, David Silverberg, Jonathan Stepanian, Andrew Vilaine, Stevery Homer, Holly Gardner, Jodi Hutchinson, Jordan Rubin, Christine Tonner, Eric Sullivan, Alan Cerborino, Esther Greenwood, David Floyd, Lauren Perlstein, Matthew Pulgrano, Tara Cariello, Lindsay Bellard, (Stephen M. Latimer, Esq., appearing for defendants Perlstein, Pulgrano, Cariello and Bellard), Jane Does 5-100 and Richard Roes 5-100, Names Being Fictitious, having been notified of the within application; and the Court having considered the plaintiff's Verified Complaint, and the two Amended Verified Complaints, the Certifications annexed thereto, and brief in support thereof; and the Court having provided an opportunity for the parties to be heard; and for other good cause having been shown;

It is on this 4th day of February, 2008;

ORDERED that a Restraining Order is hereby entered on behalf of plaintiff Rotenberg Meril Solomon Bertiger & Guttilla, P.C. ("RMSB&G"), against defendants, Stop Huntingdon Animal Cruelty, a/k/a SHAC, Win Animal Rights, a/k/a WAR, Nicholas Cooney, a/k/a Nick Cooney; Hugs For Puppies, Close HLS, Boston Animal Defense

League, a/k/a BADL, Long Island Animal Defense League, a/k/a ADL-LI, Taunton Animal Rights Activists, a/k/a TARA, New Jersey Anarchists Against HLS, HLS Sucks, Jonathan Grindell, Robert Holmes, Lauren Perlstein, David Silverberg, Jonathan Stepanian, Andrew Vilaine, Matthew Pulgrano, Stevery Homer, Holly Gardner, Jodi Hutchinson, Christine Tonner, Alan Cerborino, Tara Cariello, Lindsay Bellard, Esther Greenwood, David Floyd, Jane Does 5-100 and Richard Roes 5-100, Names Being Fictitious, jointly and severally, and all persons or entities acting with them or under their control or direction, and their agents, employees, representatives, supporters, and all persons acting in concert and in participation with them in favor of ; and it is further

ORDERED that defendants, Stop Huntingdon Animal Cruelty, a/k/a SHAC, Win Animal Rights, a/k/a WAR, Nicholas Cooney, a/k/a Nick Cooney; Hugs For Puppies, Close HLS, Boston Animal Defense League, a/k/a BADL, Long Island Animal Defense League, a/k/a ADL-LI, Taunton Animal Rights Activists, a/k/a TARA, New Jersey Anarchists Against HLS, HLS Sucks, Jonathan Grindell, Robert Holmes, Lauren Perlstein, David Silverberg, Jonathan Stepanian, Andrew Vilaine, Matthew Pulgrano, Stevery Homer, Holly Gardner, Jodi Hutchinson, Christine Tonner, Alan Cerborino, Tara Cariello, Lindsay Bellard, Esther Greenwood, David Floyd, Jane Does 5-100 and Richard Roes 5-100, Names Being Fictitious, jointly and severally, and all persons or entities acting with them or under their control or direction, and their agents, employees, representatives, supporters, and all persons acting in concert and in participation with them are hereby enjoined from committing or furthering the commission of any of the following acts:

- A. Demonstrating or protesting at the business premises of RMSB&G, or any person known or believed to be a current or former employee of RMSB&G, or at the premises of any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee without meeting the reasonable time, place and manner descriptions set forth below;
- B. Demonstrating or protesting at or near any real property known or believed to be lawfully in the possession of any RMSB&G, or any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee without meeting the time, place and manner restrictions;
- C. Approaching any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor or business associate of any RMSB&G current or former employee;
- D. Making, or encouraging or inciting others to make, harassing or threatening phone calls to the home or cell phones of any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee;

- E. Sending, or encouraging or inciting others to send, any harassing or threatening e-mail to any account owned or maintained for the benefit of RMSB&G (including but not limited to all accounts ending with "@rmsbg.com"), or to any e-mail account owned by or maintained for the benefit of any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee;
- F. Committing, or encouraging or inciting others to commit, any act of violence or making any overt or implicit threat of violence against any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee;
- G. Attempting to block the Internet web site, e-mail, facsimile lines or telephone lines of RMSB&G, or any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee;
- H. Defendants shall be prohibited from wearing masks, bandanas or hoods, from fully or partially covering their faces, or from taking any other steps to conceal their identities from RMSB&G, its targeted

employees and the police department of the township, municipality or borough of the intended protest or demonstration;

- I. Defendants shall be required to act in accordance with any and all municipal noise ordinances. Should there be no applicable noise ordinance, then defendants shall be prohibited from amplifying sounds with electronic equipment at or near the home of any person known or believed to be a current or former employee of RMSB&G, or any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee;
- J. Defendants shall be required to notify the police department of the township, municipality or borough of any intended protest or demonstration at the home or business premises of any person known or believed to be a current or former employee of RMSB&G, and the home or business premises of any person known or believed to be a family member, client, vendor, affiliate or business associate of any RMSB&G current or former employee at least seventy-two (72) hours prior to any intended protest or demonstration pursuant to this injunction of the number of protesters, the location(s), the intended target(s), and of the time and duration of the intended protest;
- K. Defendants shall be permitted to protest in a group of no more than twenty (20) persons outside the 100-foot zone around the property line of any real property or in a group of no more than thirty (30) persons

outside the 100-foot zone around the business property line of any person known or believed to be a current or former employee of RMSB&G, or any person known to be a family member, friend, client, vendor, affiliate or business associate of any RMSB&G current or former employee for no more than ninety (90) minutes no more than two times per week; and

- L. Defendants shall be prohibited from organizing, promoting, conducting, convening or engaging in any demonstration, protest, and/or picketing or leafleting activity regarding animal rights and the campaign to close HLS on Sundays, on state and federal holidays, and on Saturdays other than between the hours of 10 a.m. and 5 p.m. A demonstration, protest and/or picketing or leafleting activity at any one (1) location is limited to a period no longer than ninety (90) minutes.

IT IS FURTHER ORDERED that defendants shall post the following language on the websites owned, operated or controlled by them:

“NOTICE: THE SUPERIOR COURT OF THE STATE OF NEW JERSEY HAS ISSUED AN ORDER PROHIBITING CERTAIN ACTIVITIES RELATING TO PLAINTIFF ROTENBERG MERIL SOLOMON BERTIGER & GUTTILLA, P.C., THEIR CURRENT OR FORMER EMPLOYEES AND THEIR FAMILIES OR ANY PERSONS KNOWN OR BELIEVED TO BE FAMILY MEMBERS, THEIR CLIENTS, THEIR VENDORS, THEIR AFFILIATES, AND THEIR BUSINESS ASSOCIATES.”

Such notice shall be posted as a continuously visible underlined hyperlink which, when clicked, displays a legible, complete, and unmodified copy of all pages of the order. Such notice shall be posted on the home page of any website owned or operated by this defendant, in a typeface and color that is consistent with the most prominent reference to plaintiff on each such page, and in a manner whereby the hyperlink is proximately located to the most prominent reference to plaintiff on the page such that the hyperlink would ordinarily be displayed to users viewing the page; and

IT IS FURTHER ORDERED that defendants shall have a continuing on-going responsibility to e-mail a complete and substantially unmodified copy of all pages of this Order, to individuals on their respective e-mail lists and to any other persons who join said lists; and

IT IS FURTHER ORDERED that plaintiff shall serve true copies of this Order upon defendants within 7 days from the date hereof.

The case is hereby
dismissed



HON. PETER E. DOYNE, P.J.S.Ch.

No objection
from [unclear]