

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FORD MOTOR COMPANY,

Plaintiffs

v.

**2600 ENTERPRISES, and ERIC
CORLEY p/k/a EMMANUEL
GOLDSTEIN,**

Defendants.

Case No. 01-CV-71685-DT

Hon. Robert H. Cleland
United States District Judge

**DEFENDANTS' OBJECTIONS TO ADMISSION OF VERIFIED
COMPLAINT AS EVIDENCE**

Eric C. Grimm (P58990)
CYBERBRIEF, PLC
320 South Main Street
P.O. Box 7341
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734.332.4900

COUNSEL FOR DEFENDANTS
2600 MAGAZINE AND ERIC
CORLEY (pseudonymously known
as EMMANUEL GOLDSTEIN).

OBJECTIONS

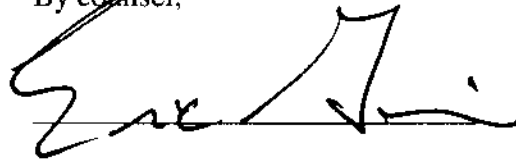
Defendants Eric Corley p/k/a Emmanuel Goldstein ("Goldstein") and 2600 Enterprises ("2600") respectfully object to the admissibility of the Verified Complaint – particularly as evidence of what "the public" or any unidentified "Internet users" happen to believe or "rely upon." Specifically, Defendants object:

1. The Affiant has no first-hand knowledge about what anybody else believes;
2. The testimony is hearsay;
3. The out-of-court and unidentified declarants (the "public" on whose behalf the Affiant purports to testify) have not been identified personally or made available for cross-examination;
4. All statements that Plaintiff admits in its prehearing memorandum consist of "conclusions of law" are objected to because the Affiant is not permitted to testify to legal matters;
5. All statements by the affiant that consist of conclusions of law should not be admitted in the guise of "evidence;"
6. The Affiant is not qualified to testify as an expert;
7. The Affiant's personal and self-serving hypotheses about what "the public" or "internet users" believe are not supported by any reliable methodology;
8. The Affiant has not disclosed the bases on which she has relied in forming her subjective opinions.

Respectfully submitted,

Eric Corley p/k/a Emmanuel Goldstein, and
2600 Enterprises,

By counsel,

A handwritten signature in black ink, appearing to read "Eric C. Grimm", written over a horizontal line.

Eric C. Grimm (P58990)

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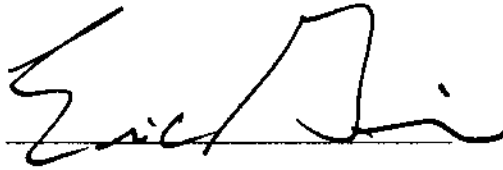
May 18, 2001

CERTIFICATE OF SERVICE

I certify that these Objections were served on Plaintiff's counsel:

- (1) Tom Lee, Esq., and
- (2) Kathleen Lang, Esq.,

By hand on May 18, 2001.

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