

HEATHER DOBROTT,	§	IN THE DISTRICT COURT
	§	
Plaintiff	§	
	§	COUNTY COURT AT LAW NO. 1
	§	
v.	§	DALLAS COUNTY, TEXAS
	§	
Timothy S. Darnell	§	
	§	
Defendant	§	

**OBJECTION TO MOTION TO COMPEL DISCOVERY AND
INTERROGATORY RESPONSES**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Timothy S. Darnell, Defendant in the above entitled and numbered cause, who files this motion to strongly object to Plaintiff's motion based on the following highly relevant and pertinent circumstances.

1. Plaintiff has a history of posting thousands upon thousands of derogatory postings about Tim Darnell on multiple threads, blogs, and websites in a continual smear campaign that has now lasted six years. On one site alone, over 6,000 posts were taken down, and Plaintiff was banned from that online forum (scam.com) due to her abusive posts. Many thousands still remain and Plaintiff continues to post daily.
2. Plaintiff brags on the Internet about suing Defendant for the primary purpose of being able to access Darnell's personal and business information which she in turn posts on multiple sites, including her smear site, <http://RealScam.com>
3. Plaintiff, since this suit has been filed has posted pictures of Darnell's children on her site, <http://RealScam.com> - Darnell's personal financial information, litigation

information, business information, family information, church information, and more.

4. Plaintiff continually and grotesquely distorts facts and fabricates damaging assessments about every aspect of Darnell's professional, personal, family, and spiritual life – constantly using the terms, “scammer,” “fraud,” “buffoon,” etc. in thousands of posts that are publicly accessible in Google, Bing, and Yahoo searches for Tim Darnell, Advantage Conferences (Tim's former business), Dr. David Darnell (Tim's father), Cottonwood Creek Baptist Church (where the Darnell family worships and serves), Jack Weinzierl (one of Tim's Representatives at Advantage Conferences), Portfolio Marketing Group (Tim's current business), along with other terms related to Darnell.
5. Plaintiff will undoubtedly take any and all new information, and do the exact same thing she always has – post that information on the Internet, and then email links that contain damaging information about Darnell to anybody who has a business relationship with Darnell, and include grotesque remarks smearing Darnell's reputation and character.
6. Plaintiff's most recent filing with this court, “Amended Motion to Compel Discovery and Interrogatory Responses,” is filled with multiple grossly erroneous statements about Darnell throughout the document, as early as point #2:
“Darnell's now defunct limited-liability corporation, Advantage Conferences, was determined to be a pyramid scheme by the Better Business Bureau of Dallas.” **That was not the determination of the court at all.** Had that been the determination, why did the BBB of Dallas rate Advantage Conferences the highest grade a direct sales company can have: “A-“ after the litigation, and the Company continued to operate three years after the litigation? That Advantage Conferences was not judged to be a pyramid has been explained in simple, clear language to the Plaintiff by Darnell and Darnell's Attorney, T. Randal Sandifer,

yet she continues to libel Darnell and Advantage Conferences by publicly asserting this obviously damaging lie.

7. In the midst of all of this ongoing, proactive damage by the Plaintiff to Darnell and others, she asserts the preposterous lie that she is the victim and that Darnell is the perpetrator. Nothing could be further from the truth. All of this damage is the result of her bizarre obsession with Darnell, thousands of unexplainable, malicious postings, and vexatious litigation. The Defendant, Darnell has nothing to do with this woman; has never had anything to do with her; and never wants to be involved with her in any way. She is the intruder, invader, and drive-by sniper who has continually obsessed over Darnell's life, businesses, family, church, and contacts and has done everything she possibly can to damage his reputation and professional life.
8. The Plaintiff has no evidence whatsoever that Darnell created, hosted, published, or even once commented on the site, heatherdobrott.com. And, she never will have any evidence implicating him because that allegation, like all the rest, is completely false. The Plaintiff is unquestionably wasting the Defendant's time and the court's time.
9. Darnell applauds the court for allowing the Plaintiff to issue a subpoena to the hosting company of heatherdobrott.com in order to find out who is behind that website. That is the exact forensic evidence that should have been uncovered prior to purposely harassing and dragging Darnell via this joke of a lawsuit.
10. If the subpoena proves that the Defendant is guilty of setting up the website that this suit is centered upon, the Defendant will consent to further discovery and interrogatories after that occurrence. The subpoena will show clearly that Darnell is not involved in any way, whatsoever.

Defendant, Darnell prays that the Court will not compel further discovery or answers to interrogatories due to the historical abuse of personal and business information, and the planned abuse and misuse of all information that the Plaintiff intends.

By: _____
Tim Darnell – Defendant, Pro Se

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on September 15, 2011.

Tim Darnell – Defendant, Pro Se