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IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE: 50 21ST JUDICIAL DISTRICT, WILLIAMSON COUNTRY, FENNESSEE FILED FOR ENTRY 12-19-18

Case No. 47877W

AT FRANKLIN

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THE LAMPO GROUP, LLC D/B/A RAMSEY SOLUTIONS,

Plaintiff,

٧.

KEVIN HELMUT PAFFRATH, THE PAFFRATH ORGANIZATION, and MEETNDONE CORPORATION

Defendants.

## AGREED ORDER EXTENDING TEMPORARY RESTRAINING ORDER AND **CONTINUING HEARING ON TEMPORARY INJUNCTION**

On December 3, 2018, the plaintiff, The Lampo Group, LLC d/b/a Ramsey Solutions ("Ramsey"), filed a Verified Complaint, an Application for Temporary Restraining Order, and a Memorandum of Facts and Law in support of Ramsey's Application.

On December 4, 2018, the Court entered a Temporary Restraining Order and set a hearing on Ramsey's motion for a temporary injunction for December 13, 2018.

On December 7, 2018, the defendants, Kevin Helmut Paffrath, The Paffrath Organization, and MeetNDone Corporation (the "Defendants"), were personally served.

As evidenced by the signatures of counsel for Ramsey and the Defendants and pursuant to Rule 65.03(5) of the Tennessee Rules of Civil Procedure, Ramsey and the Defendants agree and consent to the extension of the Temporary Restraining Order in accordance with the terms and conditions as set forth below:

1. Defendants, their officers, agents, attorneys, and all persons in active concert or participation with them, agree to remove and represent to Ramsey in this Agreed Order that Defendants have removed from all of the Defendants' social media accounts (YouTube, FaceBook, Twitter, Instagram, etc.; collectively, the "Accounts") the videos referenced in 4828-6816-5506.3

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paragraphs 57 ("Dave Ramsey: Exposed"), 68, 77 ("dave Ramsey is suing me..."), and 82 ("A Message for Dave Ramsey...") of the Verified Complaint (the "Videos"). Defendants, their officers, agents, attorneys, and all persons in active concert or participation with them, further represent that they will not re-post the Videos or cause others to re-post the Videos to any of Defendants' Accounts or elsewhere unless so permitted by the Court after the Court has heard and entered a written order on Ramsey's motion for a temporary injunction.

2. Defendants, their officers, agents, attorneys, and all persons in active concert or participation with them, agree to remove and represent through this Agreed Order that they have removed from Defendants' Accounts additional material related to Ramsey and its employees, including the post, "Dave Ramsey Sues Me," the post referencing the cease and desist letter received by Kevin Helmut Paffrath referred to in paragraph 76 of the Verified Complaint, the post referred to as the "dave ramsey diet," and the post discussing the litigation with Ramsey (the "Additional Online Material"). Defendants, their officers, agents, attorneys, and all persons in active concert or participation with them, further represent that they will not re-post the Additional Online Material or cause others to re-post the Additional Online Material to any of Defendants' Accounts or elsewhere unless so permitted by the Court after the Court has heard and entered a written order on Ramsey's motion for a temporary injunction.

3. The Defendants, their officers, agents, attorneys, and all persons in active concert or participation with them, agree not to post any content on any of Defendants' Accounts or elsewhere related to Ramsey, its employees, officers, principals, and/or this litigation. By entering into this Agreed Order, Defendants do not waive any defense(s) (including not just as to the merits but as to venue and jurisdiction) available to them with respect to the Verified Complaint or the Temporary Restraining Order.

Pursuant to the agreement of the parties, the terms of this Agreed Order shall remain in effect until the Court has heard and entered a written order on Ramsey's motion for a temporary injunction.

Pursuant to the agreement of the parties, counsel for the parties agree to continue the hearing on Ramsey's motion for temporary injunction and will contact the Court to set Ramsey's motion for temporary injunction on a date that is mutually acceptable to both parties.

DATED this  $\underline{19}$  day of December, 2018.

ancellor

CLERK'S CERTIFICATE I hereby certify that a true and exact copy of foregoing has been mailed or delivered to all parties or counsel o

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Submitted for Entry:

## BRADLEY ARANT BOULT CUMMINGS LLP

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Attorney for Defendants, Kevin Helmut Paffrath, The Paffrath Organization, and MeetNDone Corporation

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing is being served this 13th day of December, 2018 via electronic mail, on the following:

John W. Reis Fox Rothschild LLP JReis@foxrithschild.com

Counsel for Defendants

- K Bruch Th

R. Brandon Bundren

CLERK'S CERTIFICATE I hereby certify that a true and exact copy of foregoing has been mailed or delivered to all parties or counsel of record.

Clerk & Master

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