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Pro Se  
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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
Portland Division

OBSIDIAN FINANCE GROUP, LLC and  
KEVIN D. PADRICK,

Civil No. CV 11-0057 HZ  
Plaintiffs,

V.

Response To Demand for Summary Judgement.  
**Objection to Summary Judgement for Damages.**

Defendant  
Crystal L. Cox

**Crystal Cox, Defendant Lawsuit Response to :  
David Aman Push for Summary Judgement, not Based in Fact or Law.**

I Object to David Aman's Request for summary Judgement. As I am Legally defined as Media, I did not post knowing false information nor did I, personally cause damages against Kevin Padrick or Obsidian Finance.

I posted tips, documents, information and opinion as of such.

David Aman is Manipulating the courts. David Aman is pushing a Summary Judgement, while lying to the court about my cooperation, and lying about me being media. David Aman, Tonkon

Torp has favoritism in the Oregon Courts.

Judge Haggerty seems to have dropped the case, I am not sure why and left to think it is due to the judgement on a similar case in favor of the Blogger.

David Aman knew of my blog posts as of August 2009 as proven by the video deposition of bankruptcy insider Stephanie DeYoung. David Aman did nothing, Said nothing and is harassing me to silence the truth about a High Profile Bankruptcy Case.

David Aman Claims that Stephanie DeYoung Admitted that her blog was not true. If So why are her blogs still allowed to be up, why is there documentation and back up of those facts that apparently David Aman and Kevin Padrick manipulated the courts to silence her on?

Stephanie DeYoung has not admitted to me that she has no proof, in fact even as recent as last week she left a voicemail that she has proof. And has given me the names of certain 1031 exchanges in which to ask for to prove that Kevin Padrick did the exchanges wrong and deliberately did not pay the taxes. I have voicemails, emails, documents from my sources and David Aman claims I am not the Media and that I have knowingly defamed Kevin Padrick to harm him, that is in No Way True.

And yes, it is illegal for a Bankruptcy Judge to suggest a Trustee, David Aman and Kevin Padrick want to get a judge to shut up media about the Summit Bankruptcy. When I got information from insiders at the time, and the Public has a right to know this information in a Federal Bankruptcy Proceeding.

I demand a jury trial whereby I can get all evidence into court. I relied on the words of experts in the field, and documentation they swore they had. As well as opinion and documents emailed to me. There in no way should be a summary judgement against me in favor of Kevin Padrick, David Aman is manipulating the courts, discriminating against me, participating in the illegal activity of selective prosecution, harassing me, defaming me and running over my right as he manipulates a Federal Court in Oregon to grant a summary judgement against me for exposing the inside details of the Summit 1031 Bankruptcy Case.

David Aman tricked me, bullied me.. he acted like he wanted to hire me, knowing full well he had filed a 10 million dollar lawsuit against me so later he could claim extortion when in fact it was really me offering my services to many people, to change my business model as I had been approached by many to do Search Engine Reputation Management, it certainly was not the motive in the begining. I lost thousands of hours, and a whole lot of money in trying to protect the real estate consumers and to write on the Summit Bankruptcy for public interest. Once I heard the principals were going to jail, I offered Aman my services as it had become my new business model, instead of defending victims for free, and losing money. I decided to make money as a PR, SEO person and so I offered those services to many individuals, business, and all I could think of so that my media could survive in the changing economy.

I did not have any intention that was not win-win. And if David Aman is accusing me of such, well then that is criminal and I have a right to a criminal defense attorney. The summary judgement support letter of David Aman, is again harassing, defamatory and selective prosecution. And he accuses me of illegal activity, yet I am not given a criminal defense attorney to protect my rights, meanwhile David Aman is speaking for himself, Tonkon Torp and All of Obsidian Finance. Even though I have Counter Sued with legitimate claims.

David Aman is accusing me of Extortion, if the Oregon Courts grant a Summary Judgement based on this irresponsible and defaming LIE then I have committed a Crime and could see jail time and David Aman knows that and is manipulating the courts to silence the Truth about a Federal Proceeding, in which the Public has a right to know.

On Decemember 21st when I emailed that email, I did NOT in any way know that David Aman would later ask me my rates and then sue me. The email of Dec. 21st was a legitimate offer. And a great offer, as Search Engine Management costs way more and another client I took on at that time paid me \$5000 a month. I was simply offering a service, as the Summit Bankruptcy was over. And David Aman has turned it into something that will benefit him and Kevin Padrick not by legal, above board means but by manipulating the courts.

In our phone conversation recently David Aman said he would get with his client and send me a proposal for a win, win. I told him that I wanted this to be over and did not want to fight but that I had done nothing wrong and would fight. There is proof of corrupton according to my sources, and as media David Aman is singling me out when there were other bloggers and websites at the time talking about the bankruptcy.

I in NO way Admit that I defamed Kevin Padrick, or David Aman, I spoke my Opinion and the truth to the best of my knowledge. David Aman knows that via a plea bargain they cannot Sue Stephanie Deyoung for the information so they are suing me. I link to her information which is still online, I got tips, phone calls and documents. I formed my own opinion on posts as well. It is the nature of blogs and I am Media. Oregon Anti-Slapp cases have in the best had similar cases come up, I make a living as media and I am protected under media laws, under Anti-Slap laws and David Aman, Tonkon Torp, Kevin Padrick Continues to harass me in an Oregon Federal Court.

All I have posted was NEVER - EVER baseless.

David Aman knows this and Lies to a Federal Court and seemingly with no consequences.

I am being accused of Extortion, which is Criminal and I have been given No criminal rights, no attorney, no protection under the law. I, in no way was extorting David Aman or Kevin Padrick. I offered my services, David Aman emailed me for my rates, I answered him. If David Aman set me up then that too is Criminal and is also Selective Prosecution.

David Aman claims on the phone to me that he has no idea why Judge Haggerty is not on this

case anymore, however Judge Haggerty judged on a similiar case in that same Oregon Court and I allege was removed to protect David Aman's agenda.

David Aman is pitching a fit because I am telling on him. David Aman knew of my blogs since August of 2009 and now is coming at me in an Oregon Court, where he thinks that he has leverage over the courts. Just as David Aman, Kevin Padrick have sued the State of Oregon and many involved in the Summit Bankruptcy to silence the truth, and prevent further damage in David Aman, Kevin Padrick and all involved, including the Department of Justice Trustees that allowed Kevin Padrick to be the Trustee of this bankruptcy knowing full well he hade inside informaiton on the Summit Principals and was first working for them.

David Aman is desperate to silence me, in effort to not be indicted. However, once we go to trial all the evidence will roll out. The Summit 1031 victims will get another chance to speak their minds. The real money that Kevin Padrick made in the bankruptcy and is fighting to hide that secret will be exposed in court. so David Aman wants to avoid a trial and get a summary judgement to get a handle on a truth telling blogger exposing their illegal activity.

David Aman changes his "Demands" in every communication with the court, first it was stop posting, then he wanted my videos and domain names, then David Aman wanted me to stop talking about him and Tonkon Torp, when he was at first just talking about his "client" Kevin Padrick, of Obsidian Finance LLC. David Aman is acting irrational and trowing around demands, and then mixing in other companies that were not even in the original complaint. And I dont' want to agree to that "settlement" and David Aman says, even before I Disagree that I am not cooperating though he acted in good faith.

David Aman is frothing at the mouth to stop me from exposing the millions of dollars he was involved in "extorting" from the Summit Principals and the Summit 1031 Real Estate victims. And for some reason David Aman of Tonkon Torp seems to think that stopping my blogs will stop the Truth. And David Aman thinks that a 10 Million Dollar judgement against a Blogger telling the Summit 1031 Bankruptcy's Dirty little secrets, will somehow STOP the Truth.

Tonkon Torp, Portland Oregon - A Mega-Law Firm Violating the Constitutional Rights of a Blogger, an Investigative Journalist, the "Media", and ignoring the federal statutes of limitation of Defamation, ignoring Anti-Slap laws and doing all he can to manipulate an Oregon Federal Court into

David Aman is a Bully, and he is abusing the Oregon Courts, and Using your tax dollars to do it. Knowing that I certainly dont have 10 million dollars, knowing that i am legally "media", knowing that Anti-Slapp laws protect me, knowing that he has personally known of my blog posts for near 2 years and said nothing, and yet David Aman is still attacking me using Your Tax Dollars to Suppress the Truth in a Massive Bankruptcy Proceeding.

I never told David Aman, nor Kevin Padrick I would remove any posts or information for pay of any kind. I offered future PR services, that David Aman, Tonkon Torp enquired about and

that had nothing to do with past writings on the Summit 1031 bankruptcy. David Aman solicited information on my prices and fees to use against me in a court of law. David Aman, Tonkon Torp set me up and deceived me.

David Aman lied to a federal court in the details of a phone call with me. As David Aman claimed he would get with his client, and send me a proposal. When I got off the phone the emailed proposal was already there, and hours later, David Aman told a federal court that I refused his "Good Faith" effort to settle with me. So he had already "got with his client" before he called me, he lied about that. Then David Aman said I refused the proposal, when my email rejecting the proposal and why was sent to David Aman and the Federal Court approx. 7 hours later. All easily proven.

The Emails Prove these Details, yet David Aman keeps coming for me.

I do have a right to the Motion to Strike Law, David Aman's frivolous lawsuit, costing tax payers money, is way past the Statute of Limitations of Defamation as David Aman new of my writings on Summit and had concern as of August 2009, and never brought action against me or tried to contact me in any way.

I am Protected Under Oregon Anti-Slap Laws and the U.S constitution. I spoke on my blogs to the best of my knowledge. David Aman knows that Kevin Padrick worked for the Summit Principals then turned on them. They are attempting to hide the truth by silencing and Investigative Journalist, Investigative Blogger.

David Aman is desperated to cover up the Truth about the Summit 1031 Bankruptcy.

David Aman, Tonkon Torp Attorney has been in direct contact with a Man who threatened to kill me.

I object to a Summary Judgement, as a trial will provide documented proof, as well as Creditors, Investors, Insiders, Bloggers, and others will be seopened in order to proof without a doubt that there was fraud against the US government, tax fraud, that Kevin Padrick Lied. David Aman does not want this proof to get to the courts, so David Aman Wants a Summary Judgement to shut me up right away.

I don't have all documentation, no, as most investigative reporters I get information from those involved, and from experts. As Andrew Moore of the Bend Bulletin got information on the Summit Bankruptcy from Kevin Padrick, whom he deemed an expert in the situation. There was no proof or documentation required, just a phone call from Kevin Padrick. This was with other news sources at the time as well, yet David Aman keeps saying I have no documented proof.

The videos of the Original meeting Kevin Padrick had with the Summit Principals proves fraud, lies, cover ups and some sort of back end deal.. that is why Kevin Padrick threatened Stephanie DeYoung with jail time, and she took a plea bargain to get to stay with her kids. The truth is

taking the videos was NOT illegal, and Stephanie DeYoung was not the only one involved as is proven by the first video. Yet Kevin Padrick wanted the truth of this meeting concealed so bad that he bullied the weakest link, a mother of 3. And with the help of the Bend DA and not based fully in law, those videos came down. This, to me shows a collusion with the Bend DA.

All the while I was never send anything questioning my links to the videos, my version uploaded or embedded, though they knew they were on my sites starting July of 2009.

Investors Called Me, Creditors Called and Emailed Me. I was given tip after tip, there were tons of documents online and yet David Aman says I have no proof. This is selective prosecution and is illegal.

A top intellectual property attorney accuses a Blogger of Extortion, and has no liability what so ever. Even After this attorney, David Aman, Tonkon Torp solicited that Blogger to work for Him and asked my rates and services.

I never claimed I would remove posts for money. I offered futured services, that David Aman Required the details on. Then David Aman lies to a federal court and accuses me, Crystal L. Cox, investigative blogger of extortion.

There are hundreds, if not thousands of companies online that offer search engine reputation management services. It is not illegal, it is not extortion. There are hundreds of prominent sites, forums and blogs tha talk about the need for companies to have a brand manager, a reputation manager, and after years of being an investigative blogger, I got very good, accidently I must say, on getting high in the search engines. So after a few years I offered this as another service in my internet marketing.

Google has tutorials that recommend Reputation Brand Managers for all companies, yet David Aman Tonkon Torp wants to make me look bad for offering this is a reputable service.

For David Aman, Tonkon Torp Law Firm to say it is extortion is flat out harassment, defamation, illegal accusation and because I posted my sources information and my opinion on my Investigative Blogger Network, my Whistleblower Media network in previous months and years.

David Aman says in his request for Summary Judgement that Stephanie Deyoung admitted the informaton was wrong, Really? If Stephanie DeYoung, Oregon CPA and Summit 1031 Bankruptcy Whistleblower said that her blog was false and did so in a federal, state of local document or legal proceeding of record, then why was her blog allowed to stay up and why was there no disclosure posted on the blog that the information was false. Or did David Aman, Tonkon Torp Law Firm tell another lie in a Federal Court Proceedings to Sue a blogger for 10 Million Dollars.?

David Aman is desperately trying to get a Summary Judgement to contain the story. Thing

is there are Creditors, Investors, Insiders, Documents, and proof on top of proof that needs to come out in a federal court proceeding to prove once and for all how much illegal dealings really did go on in the Summit 1031 bankruptcy and whom was involved. David Aman wants a summary judgement against me right NOW to get a handle on the "media" via an odd rant in a federal court that makes no sense really.

And I have requested that Judge Hernandez, or anyone judging on my case that Judge Haggerty mysteriously dropped, I demanded in fact that Judge Hernandez sign a Conflict of Interest letter to prove that I will be treated fairly and based in law and that there will be no favoritism for Kevin Padrick, Obsidian Finance, Tonkon Torp against me in any way. I have not yet received this signed form back and David Aman is now pushing as hard as he can for summary judgement. Is this Legal?

So Just how much did Kevin Padrick of Obsidian Finance make as Trustee in a Federal Bankruptcy Proceeding, and why is this information not available to the public, especially in a State like Oregon where the Governor talks so much o government transparency?

Truth is no one had real oversight over Kevin Padrick, Obsidian Finance LLC as trustee. Not the Department of Justice Trustee, not the FBI, no one.. in fact the only one that Kevin Padrick, Obsidian Finance LLC was accountable to was Oregon CPA, Bankruptcy Whistleblower Stephanie DeYoung. She had all the facts, videos, documentation and she was making the Summit 1031 bankruptcy transparent for all to see.

Kevin Padrick, Obsidian Finance LLC did not like this and therefore used the Bend Oregon DA, used David Aman and others to silence Stephanie DeYoung the best she could to make it look like her information was not true or discredited somehow, when the fact is she was telling the truth the whole time.

In face Kevin Padrick, Obsidian Finance LLC charged to much, ignored good offers for assets, was on the Summit Principals team then jumped ship... Kevin Padrick, Obsidian Finance LLC did get the "in charge" job under questionable circumstances, and the proof on top of proof that Stephanie Deyoung posted and spoke of the top of her head was brilliant, factual, and well this rattled Kevin Padrick, Obsidian Finance LLC for not only did he have millions of dollars in pay coming in... but so did David Aman, and not to mention who ever got to buy those assets for cheap... plus the 1031 Exchanges whereby the US Taxes were never paid on the gains.

The only person in the world who knew and could prove the truth was Stephanie DeYoung. So Kevin Padrick, Obsidian Finance LLC harassed her, selectively prosecuted her, diposed her in videos, used her kids against her, charged her with a crime for taking a video that the video itself shows she was not the only one involved. And what is the big deal about the video? Well it proves that Kevin Padrick, Obsidian Finance LLC was working for the Summit Principals, got inside information and then used it against the Summit Principals.

That is Illegal and so to STOP the truth, Kevin Padrick, Obsidian Finance LLC silenced the

blogger, got her videos dropped and is now coming for me for defamation for information that is not mine and to STOP the TRUTH from getting to the Creditors, the Investors as last I heard there were a group of Investors filing a lawsuit against Kevin Padrick, Obsidian Finance LLC - so they are desperate to silence me, an investigative blogger reporting on what went on behind the scenes of one of Oregon's Biggest Bankruptcy Cases.

David Aman wants a summary judgement so that this case does not go to court, where I will seopena Creditors, Investors, Summit Insiders, Accountants, the FBI interviewer, the Department of Justice Trustee, the IRS and all documentation will turn up in court and Kevin Padrick, Ewan Rose and David Aman may even be indicted. For these alleged activities are high crimes, and once documentation lays out, fact on fact, well the whole bankruptcy is opened up and the Creditors, the Investors have facts to sue the trustee over and this must be stopped, HOW? Well just please judge, shut up that blogger, so we can keep our money and stay out of jail.

I am Legally Media, I participate in news gathering, I make a living with my media. I am Media. I write on what is of the Public's Best Interest.

Aman Falsley says "It could hardly be clearer that Ms. Cox is attempting to use her outrageous and utterly false statements about plaintiffs as leverage to extort a payment from them. This is quite a business model - first she attempts to ruin plaintiffs' reputations and then she offers to repair them for a fee - like buying "fire insurance" from a mobster to prevent him from burning down your building. The Court should put a stop to Ms. Cox's attempted extortion immediately and grant summary judgment in plaintiffs' favor." this is a Flat Out Lie. I wrote on the Summit 1031 Bankruptcy for 2 years.

David Aman he knew it, he did not say a word, and now accuses me of such in a federal court. David Aman is liable for defaming me, and endangering me.

Once the Summit Indictments were over and while in the mean time I was writing on Corruption in Montana, New York, writing on rape victims, and getting high finance tips from all over on crimes and cover ups. 2 years into it, I noticed I easily got on top of the search engines. I was going through a break up after 15 years, had recently moved out, had no real income, had pretty much lost everything, and this had become a viable skill so I offered it online, on craigslist, in emails and many places, even had personal meetings to soliciti clients. David Aman was simple one of them, after he brought himself to my attention.

I am NOT confused on the Statute of Limitations, David Aman can through as many words out as he wants. The fact is David Aman knew of my blogs, had concern as of August 2009 and did nothing. The Statute of Limitation Does apply. The Video Deposition he took proves he knew of my blogs, had concern and made no effort to ask me my motive or intentions, nor to bring me into any court or legal proceedings.

David Aman keeps saying under Oregon Law, thing is I am under the impressiion this is a



Federal Lawsuit based under Federal Law. If not this is over, as the Oregon Anti-Slap Cases protect my rights, period. David Aman is harassing me, selectively prosecuting me and is using his legal ease to bully me, set me up and act in conspiracy against me to stop me from my "media" outlets.

Links Explaining Anti-Slap Laws

<http://www.lindawilliams.net/node/23>

[http://en.wikipedia.org/wiki/Strategic\\_lawsuit\\_against\\_public\\_participation](http://en.wikipedia.org/wiki/Strategic_lawsuit_against_public_participation)

<http://www.sitejabber.com/blog/2010/09/30/the-need-for-federal-anti-slapp-legislation/>

<http://www.thefirstamendment.org/antislappresourcecenter.html>

<http://randazza.wordpress.com/2010/03/04/federal-anti-slapp-legislation-introduced-hail-rep-steve-cohen-d-tn/>

<http://litigation.lawyers.com/civil-litigation/blogs/archives/1356-Oregons-Anti-SLAPP-Statute-used-to-dismisses-commercial-defamation-case.html>

<http://www.legal-project.org/730/anti-slapp-legislation>

I am not an Attorney, Nor can I afford an Attorney. David Aman knows this and is running over my rights.

"Oregon, if a Plaintiff files a lawsuit that implicates the Defendant's First Amendment rights, the Defendant can file a "special motion to strike." Then, the Plaintiff will need to show that his suit is not just a baseless and harassing claim. If the Plaintiff can't do that, then the case is dismissed and the Plaintiff has to pay the Defendant's attorneys fees." - David Aman, Tonkon Torp is harassing me.

I have never made a statement negligently as David Aman says, "defendant made the statements negligently."

Case Dismissed under Anti-Slapp

<http://litigation.lawyers.com/civil-litigation/blogs/archives/1356-Oregons-Anti-SLAPP-Statute-used-to-dismisses-commercial-defamation-case.html>

Higher Balance LLC v. Quantum Future Group

<http://www.docstoc.com/docs/74512863/Ancer-Haggerty---Quantum-Future-Group-Case>

Goldman Sachs Site - <http://www.goldmansachs666.com/>

Case Information ( Michael Morgan Vs. Goldman Sachs and Company. Florida Court - Southern District of

Florida - Civil Action No. 09-14110-KMM -

<http://amlawdaily.typepad.com/files/goldmansachs666-complaint.pdf>

<http://amlawdaily.typepad.com/files/stipulation-and-dismissal.pdf> )

I am soon filing a Federal IRS Tip, as the 1031 Exchanges involved, especially two I have been told specifically are under allegation of tax fraud by Kevin Padrick and David Aman wants to silence me, Investigative Blogger Crystal L. Cox in order to STOP the truth from getting out.

David Aman says that I am a Private Party and am not News Media. Again this is harassing, defamation, and a lie. I am defined as "Media" if I make a living from that Media, and I Certainly do. I have hundreds of blogs, people pay to be on my blogs, I advertise on my blog network. I am legally "Media".

I am in no way just a private party. I write on major technology cases, corruption in New York Courts, Real Estate Fraud, Stolen Inventions, Spectrum, Tellecommunications and many major bankruptcy cases. I have over 400 blogs, a Private person would not be able to afford this.

I have written on the iViewit Stolen Technology, Tim Blixeth Bankruptcy, Enron, the Stanford Case, Bernie Madoff, Proskauer Rose Law Firm, Foley and Lardner, Warner Bros., Intel Corp, and more,.

I write and get tips on the biggest bankruptcy's, tech and media companies, law firms in the world and I do this on behalf of the publics best interest, I am NOT a private citizen. I have over 400 blogs. At one time had 7000 sites online. I am not a Private Citizen... I am Media.

I get tips weekly, if not daily on corruption, cover ups, fraud and I post as many as I can get to. I do this on behalf of the Public's Best Interest (which is another thing that defines me as media and protects me in Anti-Slap Laws). I am Legaly Media, and David Aman saying I am not in a federal court proceedings hurts my way of making a living.

Protected by Shield Laws?

Do my Whistleblower Media Blogs, My Investigative Blog Sites, my Real Estate Industry Whistleblower sites participate in the "the process of news gathering?"

I have spent a large amount of money on my Media Network over 7 years, I am heavily invested in time and money in this media outlet. Not as a private person, but as a source of public information.

I get tips via phone calls, chats, social networking sites, web stats, interviews in person, by the mail, and I absolutely do participate in the "the process of news gathering", which defines me as media.

I read countless documents, books, legal briefs, handouts, other news releases, articles, emailed tips and information, blogs, websites, government websites, government handouts and other research in effort to report the information that is in the publics best interest.

I have never received money from the public at large in the Summit 1031 Bankruptcy and have always reported on what is of Public Information. It was a federal bankruptcy proceeding with victims in Texas, Oregon, Montana, Idaho, Utah and more states. It was tax dollars overseeing the bankruptcy, the Summit 1031 Bankruptcy was of Public Interest and I am Media. Shield Laws to apply to me. I research, I interview, I get Tips, I study data and I spent huge amounts of time posting on media stories, mostly to do with bankruptcy corruption, court corruption, attorney corruption and other topics as noted in my blogs.. some are listed below.

Some of My Blogs are

BankruptcyCorruption.com  
EthicsComplaint.com  
InvestigativeBlogger.com  
GrizNews.com  
EurekaMontanaNews.com  
HamiltonMontanaNews.net  
KalispellMontanaNews.com  
WhitefishMontanaNews.com  
NorthwestTribune.com  
AttorneyCorruption.com  
CorruptLawFirms.com  
MontanaVictimsRights.com  
RealEstateIndustryWhistleblower.com  
RealtorSucks.com  
LibbyMontanaNews.com  
JudicialHellHole.com  
MontanaFront.com  
IndustryWhistleblower.com  
WhistleblowerMedia.com  
SecondDepartment.com  
PeterSivere.com  
WhistleblowerBlogs.net  
JeffreyBewkes.com  
ExposeCourtCorruption.com

InvestigativeJournalist.net  
CrystalLcox.com

and Many other blogs in which I report on major case all over the United State. I get tips and I do gather news, I am legally defined Media. This was never a personal rant nor did I ever have a motive of a future offering of PR services. Once I realized that David Aman thought I was defaming Kevin Padrick and filed a lawsuit, I retracted my offer for PR Immediately as the Emails will prove.

A "private" party would not be able to afford 7 years of over 5000 domain names and over 400 blogs, the overhead would be to high, this is not a private party, this is "Media".

This accusation of a private "enterprise" is defamation. I now offer this service, it is a new thing for me making a living as of last Dec. - I have to make a living and it was I became good at. My blogs were always to expose information that was of the publics interest to know. In the mean time people contacted me for "reputation management" and so I decided to go where I could then make living, that is not illegal nor was I ever extorting anyone. David Aman saying this harms my career, it is defamatory, harassing and flat out cruel.

I had put the Summit blogs on the back burner per say, and when David Aman emailed me I simply said what I do now, I in no way offered to remove past posts for a fee. I am good at what I do, and David Aman Knows it, they also know that I was posting in the begining as part of my real estate industry whistleblower sites, this is proven in the video blog of Stephanie DeYoung and it was not for a future possible job with Obsidian, I was making money then at real estate and a nutritional business. It was not until I went through a break up did I start offering the reputation management service as a way to survive.

As far as the "motion to strike under ORS § 31.150.) I believe the Plaintiff has to prove their case better. Also Anti-Slap Laws and Shield Laws apply and David Aman knows this as an Oregon Attorney and is simply trying to bully me because I am pro se.

I do not fully understand why David Aman Tonkon Torp has entered Brian Steven's plea agreement in as evidence against me. I am media, as I boldly state on my sits and what is sent to me I will post at my discretion, I make that claim, is that why David Aman is sending it, so I will post it.

My Factual Basis is Claims, Documents, Videos, Audios, Recording from my sources.

David Aman claims I am responsible if my sources are not telling the whole truth, or there is no factual basis. He also claims I knowingly posted lies. That is simply not true, I posted the truth to the best of my knowledge and yes with opinion. News, Media, Blogs do that. Not all news has all documentation when they print the news, I got facts from sources I deemed reliable. David Aman knows that by definition I am media, yet tries to get a federal court to grant a

summary judgement. This is unfair, David Aman is doing this to not have to go to trial, which is what I want so that all documentation will come out to prove fraud against the US Government, Tax Fraud and as a matter of fact I may be entitled to a Qui-Tam Lawsuit if I get money for the Federal Government via the 1031 Exchanges that Obsidian Finance Kevin Padrick did not pay tax on according to my sources. I want a jury trial to show all evidence, and bring in all witnesses, creditors, and sources. David Aman want to silence me as I know to much.

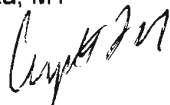
I request again this court sign the Conflict of Interest Letter to Prove that Judge Hernandez will not be biased in any way in this case. I have a right to have a non-conflicted judge.

David Aman, Tonkon Torp and Kevin Padrick of Obsidian Finance are harassing me, bullying me, and singling me out to hide corruption in a major bankruptcy case, and I am simply media posting tips, information, commentary and opinion on something this of Public Interest, Public Concern for it deals with tax dollars, tax laws governing the 1031 Exchange process, deals with Real Estate Victims in multiple states, concerns investors from around the United States and Other Countries, deals with 1031 Exchange Industry as a Whole, the Title Company and Real Estate Industry and the Bankruptcy Courts. I write on this as a public interest story and by law that is the definition of "Media", along with I do involve in the "news" gathering process. David Aman is harassing me constantly to get a summary judgement and I am guilty of no crime.

Newspapers Such as the Lee Enterprise News, the Bend Bulletin and many other news sources reporting on these topics are not required to print all factual documents, nor are they liable for opinion, details, information given by sources such as Kevin Padrick gave media during the Summit Bankruptcy. These news outlets go out to thousands daily and they do not prove their stories first, they rely on other news sources and on tips, interviews, phone calls, emails and their opinion. David Aman, engaging in selective prosecution is not legal, and is defamatory toward me and my media blog network.

Crystal L. Cox  
Pro Se  
[Crystal@CrystalCox.com](mailto:Crystal@CrystalCox.com)

PO box 1610  
Eureka, MT



#### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION TO MAKE MORE DEFINITE AND CERTAIN on:

David S. Aman

Tonkon Torp LLP  
888 SW Fifth Avenue  
Suite 1600  
Portland OR 97204

by mailing a copy thereof in a sealed, first-class postage prepaid envelope,  
addressed to said party's last-known address and depositing in the U.S.  
mail at Eureka, Montana on the date set forth below;  
by causing a copy thereof to be e-mailed to said party at last-known  
email address on the date set forth below;  
david.aman@tonkon.com

DATED this 2nd day of May 2011  
Crystal L. Cox  
Pro Se  
PO Box 1610  
Eureka, MT 59917

A handwritten signature in black ink, appearing to read "Crystal L. Cox", is written over the typed name and address of the signatory.