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**FILED**  
KING COUNTY WASHINGTON

MAY 23 2016

SUPERIOR COURT CLERK  
BY MOLLY SIMON  
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Superior Court of Washington  
County of KING

RAJ BAINS, an individual, and,  
LAW OFFICES OF RAJ BAINS,  
A Professional Services Corporation,

No. 14-<sup>2</sup>~~3~~-32854-1 KNT

**AGREED FINAL ORDER**

Plaintiffs,

and

MARK TAYLOR

Defendant.

THIS MATTER having come before the undersigned Honorable Judge/Court Commissioner of the above-entitled court upon the stipulation of the parties, pursuant to their CR2(A) Agreement (a copy of which is attached to this Agreed Final Order and incorporated by this reference), to resolve all of their claims in this matter.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

1. Defendant Mark Taylor, or anyone working on behalf of Defendant Mark Taylor, shall not activate, update or otherwise post, any information about Plaintiff Raj

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Bains on a website that deceives the public into thinking that it is a website owned by, operated by, or endorsed by Plaintiff Raj Bains or any business he operates, including the Bains Law Office. This includes, but is not limited to, the websites bainslawoffice.com, bainslawoffices.com, bainslawfirm.com, and any derivations thereof.

2. Plaintiffs nor Defendant, nor anyone acting on their behalf or in concert with them, shall not make any attempts to contact the other.
3. Defendant Mark Taylor, or anyone acting on behalf or in concert with him, shall not post on the Internet any information that is prohibited from public release by statute, court rule, or court order, including but not limited to social security numbers, UBI or tax numbers, tax records, confidential financial records, confidential health care records, or any other similar documents as well as the GAL reports.
4. Plaintiffs nor Defendant shall have contact with the other and shall not come within 1,000 feet of the other or their business or residence.
5. The civil bond posted by Plaintiffs shall be returned to Plaintiffs immediately. Plaintiffs shall not be required to pay \$500 in attorney fees previously awarded.
6. Plaintiffs nor Defendant shall make any Internet postings about the other without identifying himself as the person who posted the information.

DATED this 5/23 day of April, 2016.

  
HONORABLE JUDGE/COURT COMMISSIONER


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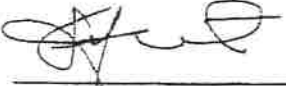
Plaintiffs' attorney:  
A signature below is actual notice of this order.

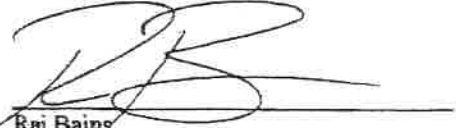
Defendant:  
A signature below is actual notice of this order.

Presented by:

Approved for Entry:  
Notice for presentation waived:

  
Matthew J. Yetter, WSBA No. 38828  
Attorney for Plaintiff

  
Jeffrey C. Grant, WSBA No. 11046  
Attorney for Defendant

  
Raj Bains  
Plaintiff

  
Mark Taylor  
Defendant

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**SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING**

In Re the Marriage of:	)	
	)	
RAJ BAINS, an individual and	)	
LAW OFFICES OF RAJ BAINS,	)	
A Professional Services Corporation,	)	NO. 14-2-32854-1 KNT
	)	NO. 14-2-33417-6 KNT
and	)	
	)	CR2(A) AGREEMENT
ANGELA MAIRE CARLSON	)	
n/k/a ANGELA MARIE BAINS,	)	
	)	
Plaintiffs,	)	
and	)	
	)	
MARK TAYLOR,	)	
	)	
Defendant.	)	

COME NOW the parties, by and through their attorneys of record, and with the intent to be bound hereby, agree as follows:

OTHER: The parties and their counsel have agreed to the terms set forth in the agreements and releases attached hereto.

It is further agreed that Boyd Buckingham shall resolve any disputes in drafting or substance in arbitration under RCW 7.04.

It is hereby further agreed by the parties that in the event either party is forced to move

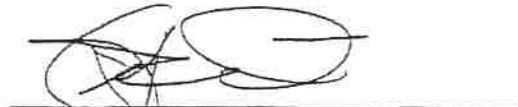
**Buckingham & LaGrandeur**  
Attorneys at Law  
321 Burnett Ave S #200  
Renton, WA 98057  
(425) 228-6662  
(425) 271-9650 facsimile

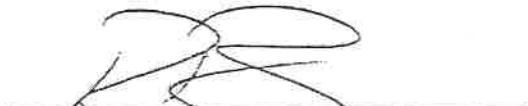
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this Court for an Order enforcing this agreement as a result of the other parties' conduct, said party shall be entitled to court costs and reasonable attorney's fees.

DATED this 5<sup>th</sup> day of February, 2016.

  
MATTHEW YETTER, WSBA #38828  
Attorney for Plaintiffs

  
JEFFREY C. GRANT, WSBA #11046  
Attorney for Defendant

  
(Raj) Bains, Plaintiff

  
Mark Taylor, Defendant

*Electronically Approved*  
Angela Carlson n/k/a Angela Bains, Plaintiff  
AK/A H:11

AGREEMENT AND RELEASE

This Agreement dated this 5<sup>th</sup> day of February, 2016, by and between MARK TAYLOR (hereinafter "Taylor") and RAJ BAINS and the BAINS LAW FIRM (hereinafter "Bains").

WHEREAS: Taylor is an individual residing in King County, Washington, and Bains is an individual residing in Pierce County, Washington and Law Offices of Raj Bains is located in King County, Washington; and,

WHEREAS: Bains has filed an action in King County Superior Court against Taylor; and,

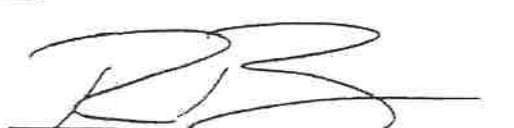
WHEREAS: The parties now desire to settle the dispute between them once and for all;


NOW, therefore, the parties agree as follows:

1. The terms set forth in Exhibit A are incorporated herein as though fully set forth below.
2. In consideration of the terms set forth in Exhibit A, both parties waive, relinquish and release any and all claims and causes of action which are based on any facts or aspect of the pending dispute between the parties, whatsoever, except as specifically provided in the terms set forth in Exhibit A attached hereto.
3. A final Order shall be entered in the lawsuit pending in King County Superior Court under cause number 14-2-32854-1 KNT containing the terms set forth in Exhibit A attached hereto.
4. This agreement is binding upon the heirs, successors and assigns of the parties.
5. In the event that either party should breach this agreement and suit be brought thereon, the prevailing party shall be awarded his reasonable attorneys' fees and court costs. Jurisdiction and venue of all such disputes shall be in King County, Washington. Prior to any suit being filed, written notification shall be provided to the other party, as well as an opportunity for the alleged violation to be corrected.

DATED this 5 day of February, 2016.

  
Mark Taylor

  
Raj Bains

  
Jeffrey Grant

  
Matthew Yetter

*Exhibit A*

1 has a clear legal and equitable right not to have his firm's website infiltrated and used to send  
 2 out embarrassing, personal and negative things about him. Based on the behavior of Mr.  
 3 Taylor to this point, Plaintiff has a well-grounded fear that this right will be invaded absent this  
 4 order. Moreover, the behavior has (and will continue to) cause damages to Plaintiff's  
 5 business. Finally, while economic damages could constitute a remedy for Defendant's  
 6 behavior, the embarrassment, humiliation, and business interference for Plaintiff cannot be  
 7 ascertained with a degree of certainty. As such, a preliminary injunction is appropriate here.

8 In crafting such an injunction, this Court is cognizant that prior restraints on speech  
 9 are disfavored and must be narrowly drawn to control the time, place and manner of the  
 10 speech rather than its content.

11 The Court can enjoin fraudulent commercial speech. *United States v. Schiff*, 379 F.3d  
 12 621 (9<sup>th</sup> Cir., 2004). Thus, the Court can enjoin the type of activity Defendant engaged in,  
 13 wherein he posted personal information on websites that were designed to make those  
 14 browsing the internet believe they were clicking on a website belonging to Plaintiff. This  
 15 constituted fraudulent commercial speech. The Court can enjoin such speech.

16 The Court further finds that it can restrict Defendant in any manner it wishes that will  
 17 serve to protect the peace and safety of Plaintiff, and which does not implicate the First  
 18 Amendment.

19 **ORDER ON MOTION FOR REVISION**

20 The motion for revision, pursuant to the court's ruling on the preliminary injunction, is  
 21 denied as moot. This order supersedes any temporary restraining order issued on this cause  
 22 number.

23 **ORDER ON MOTION FOR PRELIMINARY INJUNCTION**

24 IT IS HEREBY ORDERED that Defendant Mark Taylor, or anyone working on behalf  
 25 of Defendant Mark Taylor, shall not activate, update or otherwise post, any information about  
 26 Plaintiff Kulraj (Raj) Bains on a website that is deceives the public into thinking that it is a  
 website owned by, operated by, or endorsed by Plaintiff Kulraj (Raj) Bains or any business  
 he operates, including the Bains Law Office. This includes, but is not limited to, the  
 websites bainslawoffice.com, bainslawoffices.com, bainslawfirm.com, and any derivations  
 thereof.

*Neither party*

1 IT IS FURTHER ORDERED that Defendant, or anyone acting on his behalf or in concert  
2 with him, ~~is restrained from making any attempts to contact Plaintiff, or keep Plaintiff under~~  
3 ~~surveillance, or enter or be within 1000 feet of Plaintiff's residence or place of employment.~~

4 IT IS FURTHER ORDERED that Defendant, or anyone acting on behalf or in concert  
5 with him, shall not post on the internet any information that is prohibited from public release  
6 by statute, court rule, or court order, including but not limited to social security numbers, UBI  
7 or tax numbers, tax records, confidential financial records, confidential health care records,  
8 or any other similar documents *as well as the GAL reports, which*

9 ~~Defendant shall not commit any criminal offense against Plaintiff nor engage in any~~  
10 ~~harassment pursuant to RCW 10.14. ~~plaintiff shall have responsibility~~~~

11 DATED: ~~March 20, 2015.~~

*[Signature]*  
12 JUDGE ROGER S. ROGOFF

13 *plaintiff nor defendant*  
14 It is further ordered that ~~neither~~  
15 shall have no contact with *the other* ~~Mr. Buias~~ and  
16 shall not come within 1000 feet of  
17 ~~the office of~~ *the other* ~~business or~~ *business* of residence.

18 The civil bond posted by Plaintiff shall  
19 be returned to Plaintiff immediately.

20 Plaintiff shall not be required to pay  
21 \$500 in attorney fees previously awarded.

22 Neither party shall make any  
23 internet posting about the other  
24 without identifying himself as the  
25 ~~author~~ person who posted the  
26 information.



AGREEMENT AND RELEASE

This Agreement dated this 5<sup>th</sup> day of February, 2016, by and between MARK TAYLOR (hereinafter "Taylor") and ANGELA CARLSON, now known as Bains (hereinafter "CARLSON").

WHEREAS: Taylor is an individual residing in King County, Washington, and Carlson is an individual residing in Pierce County, Washington; and,

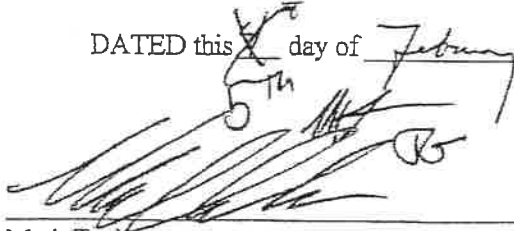
WHEREAS: <sup>Carlson</sup> Taylor has filed an action in King County Superior Court against Taylor; and,

WHEREAS: The parties now desire to settle the dispute between them once and for all;

NOW, therefore, the parties agree as follows:

1. The terms set forth in Exhibit A are incorporated herein as though fully set forth below.
2. In consideration of the terms set forth in Exhibit A, both parties waive, relinquish and release any and all claims and causes of action which are based on any facts or aspect of the pending dispute between the parties, whatsoever, except as specifically provided in the terms set forth in Exhibit A attached hereto.
3. A final Order shall be entered in the lawsuit pending in King County Superior Court under cause number 14-2-33417-6 KNT containing the terms set forth in Exhibit A.
4. This agreement is binding upon the heirs, successors and assigns of the parties.
5. In the event that either party should breach this agreement and suit be brought thereon, the prevailing party shall be awarded his reasonable attorneys' fees and court costs. Jurisdiction and venue of all such disputes shall be in King County, Washington. Prior to any suit being filed, written notification shall be provided to the other party, as well as an opportunity for the allegation violation to be corrected.

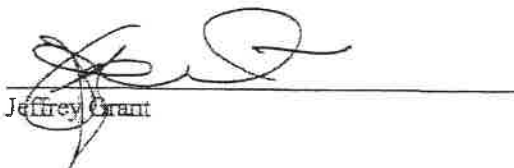
DATED this 5<sup>th</sup> day of February, 2016.

  
\_\_\_\_\_

Mark Taylor

Electronically Approved  
\_\_\_\_\_

Angela Carlson

  
\_\_\_\_\_

Jeffrey Grant

  
\_\_\_\_\_

Matthew Yetter

## Exhibit A

Angela

1 continuation of the conduct will result in actual and substantial injury. *Tyler Pipe Industries,*  
 2 *Inc. v. State Department of Revenue*, 96 Wn.2d 785, 638 P.2d 1213 (1982). Here, Plaintiff  
 3 has a clear legal and equitable right not to have her personal residential address conflated  
 4 on a public website with the name and information of a man from whom she is protected by  
 5 court order. The conflation of these two pieces of information puts her in danger and is akin  
 6 to yelling fire in a crowded movie house. Based on the behavior of Mr. Taylor to this point,  
 7 Plaintiff has a well-grounded fear that this right will be invaded absent this order. Moreover,  
 8 the behavior has (and will continue to) cause damages to Plaintiff. Finally, while economic  
 9 damages could constitute a remedy for Defendant's behavior, the embarrassment,  
 10 humiliation, and danger for Plaintiff cannot be ascertained with a degree of certainty. As  
 11 such, a preliminary injunction is appropriate here.

12 In crafting such an injunction, this Court is cognizant that prior restraints on speech  
 13 are disfavored and must be narrowly drawn to control the time, place and manner of the  
 14 speech rather than its content.

15 The Court can enjoin speech that causes a clear and present danger. *United States*  
 16 *v. Keyser*, 704 F.3d 631 (9<sup>th</sup> Cir., 2012). Thus, the Court can enjoin the type of activity  
 17 Defendant engaged in, wherein he posted personal information on the same website where  
 18 he posted information about Plaintiff's attacker.

19 The Court further finds that it can restrict Defendant in any manner it wishes that will  
 20 serve to protect the peace and safety of Plaintiff, and which does not implicate the First  
 21 Amendment.

**ORDER ON MOTION FOR REVISION**

22 The motion for revision, pursuant to the court's ruling on the preliminary injunction, is  
 23 denied as moot. This order supersedes any temporary restraining order issued on this cause  
 24 number.

**ORDER ON MOTION FOR PRELIMINARY INJUNCTION.**

25 IT IS HEREBY ORDERED that Defendant Mark Taylor, or anyone working on behalf  
 26 of Defendant Mark Taylor, shall not activate, update or otherwise post, any information about  
 Plaintiff Angela Carlson on a website that also contains the name of the person against  
 whom Ms. Carlson has a protection, anti-harassment, or no-contact order, nor the cause  
 number of the case that resulted in the protection order, *provided he has been*  
*given prior notice of such protection, anti-harassment or no-contact.*

**ORDER DENYING, IN PART, AND GRANTING IN PART,** *order prior to posting*  
 PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION— Page 3

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*Neither party*

IT IS FURTHER ORDERED that Defendant, or anyone acting on his behalf or in concert with him, <sup>shall not make</sup> is restrained from making any attempts to contact Plaintiff, or keep Plaintiff under surveillance, or enter or be within 1000 feet of Plaintiff's residence or place of employment, <sup>the other</sup> ~~the other~~

IT IS FURTHER ORDERED that <sup>Neither party</sup> Defendant, or anyone acting on behalf or in concert with him, shall not post on the internet any information <sup>that is prohibited from public release</sup> that is prohibited from public release by statute, court rule, or court order, including but not limited to social security numbers, UBI or tax numbers, tax records, confidential financial records, confidential health care records, or any other similar documents.

~~IT IS FURTHER ORDERED that Defendant shall not commit any criminal offense against Plaintiff nor engage in harassment as defined in RCW 10.14.~~

~~DATED: March 20, 2015.~~

~~  
JUDGE ROGERS, ROJ OFF~~

*Neither Carlson or Taylor shall*

~~Defendant shall have no contact with Plaintiff.~~

~~Defendant shall not~~ make any postings regarding ~~the other~~. This does not prohibit postings regarding RAS being pursuant to orders under cause number 14-2-32854-1 KNT.

*Plaintiff to receive her bond back immediately.*