

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, ss.

SUPERIOR COURT
NO. BACV2011-00433

JESSE E. TORRES, III and)
JENNIFER J. ADAMS,)
) Plaintiffs,)
))
) vs)
))
SOPHIE J. TORRES,)
JESSE E. TORRES, IV,)
DEBTMERICA, LLC, and)
DONALD F.TORRES,)
) Defendants)
_____)

DEFENDANT SOPHIE TORRES' EX PARTE MOTION
FOR SHORT ORDER OF NOTICE

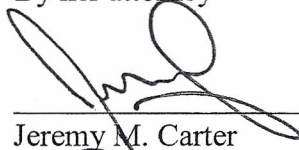
NOW COMES THE DEFENDANT, Sophie Torres, by and through her counsel, and respectfully requests that this Honorable Court enter a short order of notice on Defendant's Motion for Plaintiffs to Cease and Desist publication of documents related to this legal matter, private documents pertaining to the Defendant, Sophie Torres, and other inappropriate, illegitimate, and untrue information on the internet.

AS GROUNDS FOR THIS MOTION, Defendant, Sophie Torres, states that the Plaintiff, Jesse E. Torres, III, after receiving a warning to discontinue all internet publications from this Honorable Court, continues to publish information on the internet pertaining to the legal proceedings, private information and documents pertaining to the Defendant, Sophie Torres (who is an elder of approximately 90 years of age), as well as other information regarding the Defendant, Sophie Torres, all of which is false, misleading and untrue. Further, the Plaintiff and/or Plaintiffs have recently published inappropriate and untrue information in regard to Defendant, Sophie Torres, legal counsel. Defendant, Sophie Torres, states that the Plaintiff and/or Plaintiffs are

causing irreparable harm and emotional distress by continuing to inappropriately post private documents, legal documents pending with this Honorable Court, as well as false, misleading and untrue information, on the internet which are disparaging her character and reputation. Copies of the Plaintiff's home page, from his website, "plaintiff.jetiii.com" and a recent posting to "newatchdogs.com" evidencing the internet postings and web links to private documents, legal matters pending before this Honorable Court, and false, misleading and untrue information in regard to the Defendant, Sophie Torres, and her legal counsel is attached hereto and incorporated herein as Exhibit "A".

WHEREFORE, the Defendant, Sophie Torres, requests that this Honorable Court enter a short order of notice on Defendant's Motion to Cease and Desist and allow said Motion to be heard immediately.

Respectfully submitted,
Sophie J. Torres,
By her attorney



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Dated: August 19, 2011