

No. \_\_\_\_\_

Mark and Rhonda Leshar,  
*Plaintiffs,*

v.

John and Jane Does 1-178,  
*Defendants.*

§ IN THE DISTRICT COURT  
§ OF TARRANT COUNTY, TEXAS  
§ \_\_\_\_\_ JUDICIAL DISTRICT  
§

### **ORIGINAL PETITION**

TO THE HONORABLE COURT:

Plaintiffs Mark Leshar (last three numbers of social security number: 575; last three numbers of Texas driver's license number: 007) and Rhonda Leshar (last three numbers of social security number: 229; last three numbers of Texas driver's license number: 064) ["Plaintiff/Plaintiffs"] individually and collectively bring this action against John and Jane Does 1-178 for defamation under the laws of Texas.

### **Discovery Control Plan**

1. Plaintiffs affirmatively plead that 1) the damages resulting from the cause of action brought forth herein are within the jurisdictional limits of the District Court and 2) discovery should be conducted in accordance with a discovery control plan under Civil Procedure Rule 190.3 (Level 2).

### **Parties**

2. Plaintiff, Mark Leshar, an individual, is a resident of Clarksville, Texas.
3. Plaintiff, Rhonda Leshar, an individual, is a resident of Clarksville, Texas.
4. The real names and residences of Defendants, John and Jane Does 1-178 are currently unknown.

### **Venue**

5. Venue is permissive in Tarrant County under Texas Civil Practices & Remedies Code section 15.017 because this suit involves libel and is filed in the county where at least one defendant is located, according to IP address locators on the website in question.

## Facts

6. Plaintiffs Mark and Rhonda Leshner are the victims of a vicious cyber-defamation campaign that was waged on [www.topix.com](http://www.topix.com). Each of the Defendants has chosen to hide behind pseudonymous user names and has yet to be identified. A significant number of these posts originate in Tarrant County, Texas. Plaintiffs seek to discover the identities of these John and Jane Doe Defendants and hold them accountable for their actions.

7. Plaintiffs Mark and Rhonda Leshner have been upstanding members of the Clarksville, Texas community for over 20 years. As of July 2007, the population of Clarksville was approximately 3,508.

8. Each plaintiff operated a successful business within the community. Mr. Leshner is an attorney of good-standing, and Mrs. Leshner operates a beauty salon. Each business is located primarily in the town of Clarksville, Texas, in Red River County. Mr. Leshner also has a law office located in Texarkana, Texas.

9. In April 2008, Mr. and Mrs. Leshner were wrongfully accused of sexually assaulting Shannon Coyle, a former client of Mr. Leshner.

10. Charges were brought to a grand jury by the County Attorney, Val Varley. The Leshners were indicted and subsequently released on bond.

11. Almost immediately following said allegations, defamatory comments began to appear on topix.com. Since then, over 25,000 comments have been posted to message boards concerning the charges levied against the Plaintiffs. Most of these comments can be found on one or more of over 70 individual threads located in the "Clarksville, TX", "McKinney, TX", and/or "Avery, TX" forums. Defamatory comments concerning the Plaintiffs are also located on Topix message-boards of nearby geographic communities, such as "Texarkana, TX" and/or "Garvin, OK."

12. Neither one of the Leshners had any presence on Topix.com before these postings.

13. All relevant comments have been printed out in hard copy by the Plaintiffs or Plaintiffs' employees and are currently located in 18 (eighteen) 3 inch-wide binders. These binders are presently in Plaintiff's possession and are ready to be presented to the Court. While Plaintiffs' counsel recognizes that it will not be a part of the final records, an affidavit evidencing the accuracy and reliability of these documents is provided in Exhibit "A" and is attached hereto. These records will foreseeably be supplemented by authenticated business records in the event that Topix complies with the subpoena Plaintiffs intend to submit upon the Court's approval of the order submitted herewith.

14. To date, Plaintiffs have generated a comprehensive spreadsheet detailing over 1700 defamatory statements directed at the Plaintiffs. The following comments are exemplars of the postings Plaintiffs find actionable:

- i. "...She actually contracted HSV-2, around her eyes, after a visit to U.T. [*n.b.* Unique Touch] where Rhonda did her hair..." (*posted 5/8/08, in "leshers go to jail" by ilbedipt*);
- ii. "...Mark Leshar...wants to grow weed, sells weed, sells dope, sex orgies at his bar and spreads herpes, drug and rape women while Rhonda gives oral sex while they watch, ...gets kick backs on projects like mail street, ...buys Rhonda strippers to have oral sex with and spread diseases...'ANTICHRIST'." (*posted 5/14/08, in "leshers go to jail" by Smiley*);
- iii. "I Charlie do here by state that MARK LESHER, RHONDA LESHER are without a doubt, CRIMINALS... They steal from people. They are selling drugs. They are molesting helpless people. They are completely untrustworthy. BEWARE... It IS A FACT. NOW YOU CAN SUE ME." (*posted 7/18/08, in "Criminal Trio" by ilbedipt*);
- iv. "...lesher was the one that had her on drugs with the help of McCarver selling them to her for Mark Leshar...'TRIO OF TRASH' raped her and Rhonda[Long]Leshar tried to suck her guts out she got scared a n off drugs...'SCUMBS'... Robert Lynn McCarver has 'CONFESSED' and other evidence raised their charges to AggSexual assault. You Leshar perverted 'SCUMB' can lie and twist 'FACTS' but this 'TRASH' will go to Jail!!!!!!!!!!!!!" (*posted 9/15/08, in "Attorney arrested on sexual assault charges," by oh my*);
- v. "I think that Buddy fellow must go to the 'UNIQUE TOUCH' [properly named] and Rhonda gave him her 'FAMOUS' [to perverts] 'BUTT TONGUE' job... Wonder if Mark Leshar watched and played with his balls? (*posted 11/29/08, in "Attorney arrested on sexual assault charges", by lou*);
- vi. "HOLY MOLY the Leshers are BAD, Rapeing the COWS and THree BULLS. yikes BUT it figures" (*posted 12/03/08, in "Attorney arrested on sexual assault charges", by Awareness*); and
- vii. "...that's where the bite marks came from... hell Leshar been biting my DONKEY!!!!!!!!... All them bite marks are all around my poor ol donkies SCHLONG area.... That Leshar better be careful.. my donkey knows some real mean mules that drive white truck." (*posted 12/06/08, in "Attorney arrested on sexual assault charges", by Awareness*)

15. Topix is, and all times was, an interactive internet news bulletin board. Topix.com claims to be "the largest news community of the web", and has as its headline, "Your town. Your news. Your take." The company states that its goal is to make passive news interactive both by 1) posting automatically through "bots" and 2) allowing users to post news articles from their respective communities. Topix then invites back-and-forth commentary from users in the same community using a "message-board" or "blog" format where users control the content. Furthermore, upon opening Topix's homepage, users are directed to a community website portal. This portal is automatically selected for the user, presumably upon their IP address.

16. Individuals who wish to post comments on any thread in the Topix.com forums are not required to give their real names. To post, Topix only requires that the commenter provide a user name of their choice, content, and a randomly generated alpha-numeric code (presumably to limit the amount of spam comments to the site). While the vast majority of posters choose to use

pseudonyms (e.g. “Hellcat”, “Awareness”, “ilbedipt”, or “lou”), posters can easily impersonate one another by simply providing a user name of his or her choice (including ones that other people have previously utilized); similarly, individual posters can (and do) adopt multiple usernames.

17. In September 2008, the prosecutor in the alleged sexual assault case and the Leshers agreed to a change of venue due (at least in part) to the inability of the Plaintiffs to acquire a fair trial in Red River County. The criminal trial was then moved to McKinney (Collin County). The defamatory posts in question continued on both the Topix.com forum for Clarksville and a new one in McKinney.

18. These threads and defamatory comments can easily be found using a search on the internet search engine “Google.” By entering a persons’ name into the search engine, the engine will list various threads in which that name appears as a result. As of Friday, January 23<sup>rd</sup>, 2009, the top two results for both “Mark Leshner” and “Rhonda Leshner” were threads and comments that had been posted on Topix.com relating to the criminal charges.

19. Although countless comments on Topix’s webpage 1) are defamatory per quod, 2) intrude on the seclusion of the Plaintiffs, and/or 3) constitute disparagement of one or both of the Plaintiffs’ businesses, Plaintiffs have limited this original pleading to those statements which are arguably defamatory under Texas law.

20. The Plaintiffs were found not guilty on all counts of sexual assault by a jury in Collin County on January 15, 2009. During the criminal trial, Mrs. Leshner testified to the fact that these rumors and comments have changed her life, stating, “I will never be the same. You can’t imagine what it is like going to a grocery store and facing anyone who knows about these charges.”

21. Defendants maliciously and systematically attacked the Plaintiffs on the Topix.com message boards over the course of almost a year. This has affected their reputations in the community as businesspersons and has damaged their business. It has created psychological, emotional, and financial trauma for both plaintiffs.

22. For the ease of the court and the defendants individually, a portion of the comment is included in each count. Plaintiffs have attempted to include italicized information within brackets where necessary in an attempt to clarify potentially ambiguous postings. Original comments in context can be provided at the request of the Court.

23. Plaintiffs have made every effort to organize this extensive pleading in a logical and reasonable manner. To that end, the following counts are listed alphabetically by pseudonymous author. More specifically, each initial count of defamation lists the pseudonym of the respective defendant underneath it; the immediately subsequent libel per se and defamation per se counts expressly refer back to the preceding defamation count (and the pseudonym listed).

24. Unfortunately, listing each count individually will exceed 1,300 pages.

Count 1 - Defamation  
Abnormal

1. Defendant published a statement by written communication asserting as fact that, “Wonder why Rhondas 'TONGUE' is not hanging out? I ber Rhonda knows how all these women taste!!!”
2. The statement involved a private matter.
3. Alternatively, the statement involved a public matter.
4. The statement referred to plaintiff by name.
5. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.
6. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.
7. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.
8. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
9. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
10. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.
11. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
12. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

### Count 2 – Libel Per Se

13. Defendant’s written statement(s) described in Count 1 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

14. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

### Count 3 - Defamation per se

15. Defendant’s written statement(s) described in Count 1 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

16. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

### Count 4 - Defamation African American Day

17. Defendant published a statement by written communication asserting as fact that, “African American Day, half price! “Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

18. The statement involved a private matter.

19. Alternatively, the statement involved a public matter.

20. The statement referred to plaintiff by name.

21. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

22. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

23. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

24. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of conduct that injured his and/or her professional

occupation.

25. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

26. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

27. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of committing a crime.

28. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

29. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

30. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of having a loathsome disease.

31. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by implication.

32. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by innuendo.

33. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

34. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

35. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

36. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

37. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

38. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

39. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

40. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 5 – Libel Per Se

41. Defendant's written statement(s) described in Count 4 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

42. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 6 - Defamation per se

43. Defendant's written statement(s) described in Count 4 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

44. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

45. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

46. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

47. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

48. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 7-8 - Defamation Anonymus

49. Defendant published a statement by written communication asserting as fact that,



a. “...The F.B.I. want Mark Lesher for several outhr crimes...Mark Lesher gave Jerry Coyel drugs when he was working out at race for life before his back surgery, Human Groth Hormone, Testitrone, Pills, Viagra, deca...Jerry Coyel gave the F.B.I. These ileagal drugs mark had gave him to sample...I have waited for months for the F.B.I. To finally take Lesher down...This is just a sample of what Lesher is facing. The rrcounty Sheriff Iffice has these records.”

b. “Leshers History...[4] 'DRUGS' Makes illegal 'DRUGS', grows illegal 'DRUGS'! Sells illegal 'DRUGS'!...[6] 'RAPE' Drugged and 'RAPED' a woman! [7] Tried to get D.J. Coyel to lie to a Judge...Rhonda Lesher has lied under oath...”

50. The statement involved a private matter.

51. Alternatively, it involved a public matter.

52. The statement referred to Plaintiff by name.

53. The statements were defamatory because they unambiguously accused the Plaintiff of committing a crime.

54. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

55. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

56. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

57. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

58. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

59. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

60. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the

issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 9-10 – Libel per se

61. Defendant’s written statement(s) described in Counts 7-8 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

62. Further, Defendant’s written statement(s) described in Count 7-8 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

63. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 11-12 - Defamation per se

64. Defendant’s written statement(s) described in Counts 7-8 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

65. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 13-73 - Defamation Awareness

66. Defendant published statements by written communication asserting as fact that,

a. “Aslo said it was two BLACK men and they left in a WHITE pu.....no other description given... we all KNOW that Rhonda and Mark think Black people are not human or worthwhile... Their own words.”

b. “...The only ones that had anything to do with the ACTUAL assault were the TRIO, the Victim and Mike Rice(after the fact).

c. “...It will be shown that Mark and Robert ,actually planned the deal...assault... Mark was after the victim to have sex with Rhonda and she was not going for it...SOOOO the plan was hatched to knock her out so they could do their deed. AND DID... Robert and Mark and MIKE

Rice talked (the next day) about what would happen if they did let her leave, after she threw a fit about what happened...”

d. “TURN out the LIGHTS the party 's over. The polygraph is out and the Confession is in.”

e. “...There will be another witness, to be called to repeat what Rhonda told her about the incident, the day after it occurred...She will testify that her friend Rhonda, recounted the sexual engagement of the victim and what a great affair it was...NOW we have three people cooborating the fact that Rhonda did perform sex on the victim...”

f. “...go to the U.T. In Clarksville and just listen long enough and you will hear Rhonda Lesher tell of some exploits of hers and Marks. She is quick to point out that she enjoys threesomes with Mark and Another man and they both will perform oral sex on her and EACH OTHER and thatit is a real turn on for her to watch tem do it...”

g. “Mark LESHER is a coward that hide behind women ,when he is not drugging them and RAPING them. The only reason he hasn't TAKEN care of Rhonda is because he I scared of her and besides that she is PERVERTED like him and he likes to her his jollies off watching her with other women and men and joins in on most occasions...You YELLOW BELLY ,scum sucking PIG...”

h. “...EVERYONE knows I post as Awareness or ilbedipt only, since may. I started this deal about the LESHERS dirty deed back in april and under the handle SEE IT ALL. WENT to ilbedipt and now Awareness...”

i. “I also heard that Rhonda Lesher likes to have sex with WOMEN and MEN,,,,but mostly women....that is true also. Everyone in town knows that . Even Rhonda herself will tell that to be true.”

j. “We put all our FACTS here... for your enjoyment... I can't wait to see what you followers will say when the Pervert scum go tom PRISON for Aggravated Sexual Assault... Yeah, well, they will still be in PRISON.”

k. “...Then the ASSAULT occured because of the Leshers perverted lifestyle choices and self gratification needs with a vulnerable person they thought they could control. The assault was a matter of oppportunity.”

l. “...She [*n.b Rhonda Lesher*] was the instigator of the Assault. The BOYS saw her having fun and just decided they ,too should indulge.”

m. “..The attack happened the night before and then the Leshers went off to work or somewhere...and when the Victim came to enough to realize what actually happened to her ,the next morning ,she freaked out...”

n. “Well, the WORD on the streets is that they have been involved in the drug trade for some time. It is not unheard of that NICE people turn to drug trade for \$\$\$\$\$.”

o. “...Rhonda Lesher has not been real secretive about her and PINKY's exploits in deviant sexual actions with WHOMEVER. She made sure everyone knew, by telling all in her shop...”

p. “...Lida [*n.b. Linda Velvin*] and Marks 'marriage' went south because Linda found out Mark was supplying most of drugs to him [*Linda Velvin's son*]...”

q. “...From that conversation will come the evidence of drug supplying and dealing for PROFIT...I can see why he hired BOTSFORD...”

r. “...CLASSY lady that RHONDA LONG LESBIAN LESHER LEECH.”

s. “...The Law has the TAPES of Robert confession and the tapes of him bragging and telling of details about the incident...”

t. “...OH yes and MIKE RICE was near by [*n.b. during the alleged attack*]...”

- u. “...These two cancers on society ,MARK and RHONDA, must be pure evil to those real close anyway... All their sex partners should be worried ,I think
- v. “...that's where the bite marks came from... hell Lesher been biting my DONKEY!!!!!!... All them bite marks are all around my poor ol donkies SCHLONG area.... That Lesher better be careful.. my donkey knows some real mean mules that drive white truck.”
- w. “...The confession was McCarvers.... the one he gave to investigators... Neve did we say it was MARKs..... it was telling of MARKs involvement and other info avout MARK LESHERS misdeeds...”
- x. “Hey, Mark, listen, listen, that sound you hear s the chains rattleing. The chains they put on the PRISONERS headed for the HUNTSVILLE DIAGNOSTIC center, where they take them for introduction to PRISON life and rules. Where they will make 'em STRIP naked and submit to a full body and cavity search, then spray them down for lice and then issue them the WHITE clothes they will wear for many, many Years CLING CLING CLING KA LANG.”
- y. “ACTUALLY. THERE is this thing called JURY TAMPERING... which is a FELONY in itself...”
- z. “Rhonda told Angela R. at the U.T. That she don't have anything against black folk. Hell I think everyone should OWN a few...”
- aa. “...In PRISON and BROKEN... The BLACK men in prison will own MARK and the Black women will RENT Rhonda out.”
- bb. “When LESHER COACHED the Coyel boy before the trial, he was actually obstructing justice,also... It has already been shown in court record,that Mark tried to get the boy to lie to the court.”
- cc. “...MARK LESHES also had SC sign a WILL FORM while at the compound... HOW about the POWER of ATTY. He had her sign ,all the while under the influence of drugs????
- dd. “WHEN a TRIO of perverts RAPE a woman .It is not a family dispute...”
- ee. “...knowing how she felt about blacks and the way she always puts them down at the U.T.”
- ff. “...This is about the Leshers RAPE of a Lady. And you and the rest of the followers do nothing but try to make it about everyone, everything or anything to try and divert attention from The Horrible crime The Trio committed...”
- gg. “...She [*n.b. Shannon Coyel*] was not aware that she was being drugged to the point of being incapacitated for A sexfest for the Leshes Trio...”
- hh. “...I post as ilbedipt or Awareness... because that s who I am...”
- ii. “...I was not threatening anyone...I am worried for ROBERT... It is getting closer tho the trial... And SOME of his friends might not want him to make it there. Strange things happen around the LESHES...”
- jj. “Wonder if the Herpies Queen knows of this.”
- kk. “...But the Heart of the matter is that a WOMAN was SEXUALLY ASSAULTED while incapacitated to the extent to not be able to give consent or NOT give consent to sexual contact by the defendants...Some of us,Victims friends, have been over zealous in our expressions of outrage and matbe gone the wrong way of expressing it...”
- ll. “...PINKY may still have a small reach while in PRISON. Some of the drug runners he uses may be LOYAL.”
- mm. “...BOTSFORD and at least one of the other ATTY.s for these creeps are seriously considering withdrawing from the case, due to the DEATH threats coming from their clients towards JC,Bridges and Val...”

- nn. “HOLY MOLY the Leshers are BAD, Rapeing the COWS and THree BULLS. yikes BUT it figures”
- oo. “...the time is short for the TRIO to be free... They know of the Trio's guilt and cannot find a way to escape the inevitable. But that is nothing compared to the PRESSURE ol'PINKY and his herpes Queen are feeling...”
- pp. “...NONE of the things the FOLLOWERS and CRIMINALS have said is truth or have happened.....nor will happen.... Even their VIOLENT threats are HOT AIR, but we will stand ready if they get CRAZY and desperate.”
- qq. “...I can understand ,that some may LOVE the McLESHERWOODS bunch for the weird and self gratifying sexual exploits.... But to stand up for the things they do to children and the hurt they cause them and their families is completely unfathomable...”
- rr. “...The complete time line and totally accurate story of what happened will be outlined and cooberrated by the victim , Robert's statements and other witnesses...The testimony in court will be what is damning for the TRIO...the Lesher Trio of SEXUAL PREDATORS will be OFF to PRISON.”
- ss. “...There is more but I'll have to wait for confermation on these bribes. We have heard of.”
- tt. “...the Sexual assault of SC by Mark and Rhonda Leshes and Robert McCarver... IT is clear that the DEFENDANTS had every right to have sex with her while she was incoherent and unable to give them permission... I am sure she would have had she been Coherent, but she wasn't able to withstand the drugs we gave her to take...”
- uu. “Now, speaking of DOPE...it will be shown in court that someone ,other than the owner of Apache is the one handling the DOPE and supplying it to the public,for profit gain. Even having it delivered to a very well known Singing artist. This too is in tapped conversations provided by one of the TRIO...YOU GUESS WHO...”
- vv. “...Even marks Wifey is still fuming over this deal...It is the only chance to keep the RAT McCarver from doing any more damage. What a fine PICKLE ol'pinkie has gotten himself into.”
- ww. “...MARK LESHES had MIKE RICE and ROBERT McCARVER take her [*n.b. Shannon Coyel*] from the MAIN house, to the Trailer after she became distraught and panicked over the Assault and wanted to leave, but Mark Leshes instructed the two BOYS to put her in the reailer and Robert was to remain with her so she could not leave until Mark and Rhonda returned from THEIR JOBS, and then they would handle it. They Hid her KEYS from her and tried to get her to take more DOPE...”
- xx. “We leave the Paper ads to the LESHES ,as they have done in past.... That way we have their lies in print.”
- yy. “...If he Mark has clean hands there will be no more trials. But we all know that is not so.”
- zz. “If in fact they prove to have AIDS and KNEW it, they can be tried for attempted MURDER.”
- aaa. “...Rhonda has told of many times where she and Mark and another man have the three way deal and all perform on each other. She even admitted the TURN ON it brings her to watch the TWO men together...”
- bbb. “...What about the Leshes penchant for multiple sex partners ,WHILE MARRIED?...”
- ccc. “If the Leshes did not believe in or practice the perverted sexual pleasures they do, they would not be in the situation they now are in...”

ddd. "...I understand there is a tape of him [*n.b. Robert McCarver*] ,in jail...There is also a taped ,audio and video, of him giving derails [details] to the LAW..."

eee. "LISTEN..... jingle jingle jingle. That ain't bells.... It's the chains and shackles get prepared for the TRIO."

fff. "...My focus is on the LESHER TRIO and their CRIME against the VICTIM and the THREATS against her HUSBAND and family"

ggg. "The only interest I have in this PARTICULAR case is the CROOKEED LAWYER MARK (pinky)LESHER..."

hhh. "REMEMBER it is RHONDA that has already committed perjury in one court..."

67. The statements involved a private matter.

68. Alternatively, the statements involved a public matter.

69. The statements referred to plaintiff by name and/or indirectly.

70. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

71. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

72. Additionally and/or alternatively, the statement were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

73. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

74. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

75. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

76. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of committing a crime.

77. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

78. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

79. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of having a loathsome disease.

80. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by implication.

81. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by innuendo.

82. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

83. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

84. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

85. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

86. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

87. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

88. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

89. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 74 – 134 - Defamation per se

90. Defendant's written statement(s) described in Counts 13-73 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

91. Further, Defendant's written statement(s) were defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.
92. Further, Defendant's statement(s) were also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct
93. Further, Defendant's written statement(s) were defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.
94. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.
95. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 135-195

Libel per se

96. Defendant's written statement(s) described in Count 13-73 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.
97. Further, Defendant's written statement(s) described in Counts 13-73 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.
98. Further, Defendant's written statement(s) described in Counts were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.
99. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Count 196 - Defamation

Awwwwwww

100. Defendant published a statement by written communication asserting as fact that, "...Rhonda[Long]Leshers brother Ricky Long is busted with Mark Leshers 'DRUGS'...'FACTS'"
101. The statement involved a private matter.
102. Alternatively, it involved a public matter.



103. The statement referred to plaintiff by name.
104. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.
105. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
106. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
107. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.
108. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
109. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
110. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
111. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 197 – Libel Per Se

112. Defendant's written statement(s) described in Count 196 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.
113. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 198 - Defamation per se

114. Defendant's written statement(s) described in Count 196 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

115. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 199 – Defamation  
baba Lou

116. Defendant published a statement by written communication asserting as fact that,

a. “Illegally obtained evidence? I think Henry ment the confession by Robert McCarver as to their guilt. Robert McCarver was making a deal with the D.A., that was taped and videoed confessing their crime! 'NOW TWIST THAT'!!!!!!”

b. “...I would have loved to have seen Mark and Rhonda Leshers face when they saw and heard the confession off McCarver!”

c. “This must be ole Lawsuit Lesher, I would be drunk to. You better drink all you can, you can't get drunk in Jail!”

117. The statement involved a private matter.

118. Alternatively, the statement involved a public matter.

119. The statement referred to plaintiff by name.

120. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

121. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

122. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

123. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

124. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

125. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

126. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

127. The statement was false because Plaintiff has not participated in the conduct alleged by the Defendant.

128. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

129. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

130. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

131. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 200 - Defamation per se

132. Defendant's written statement(s) described in Count 199 was defamatory per se under the common law because Defendant falsely accused Plaintiff of committing a crime.

133. Further, Defendant's written statement(s) described in Count 199 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

134. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

135. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 201 – Libel Per Se

136. Defendant’s written statement(s) described in Count 199 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

137. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 202 – 206 - Defamation

Beth

138. Defendant published a statement by written communication asserting as fact that,

- a. “Look, I did go to the UT several times, until I got disgusted, over what I heard and had seen...”
- b. “I have seen, and heard about Rhondas toys. 'DISGUSTING'?”
- c. “What happened to the lady that had Attorney Dan Meehan sue Rhonda Leshner, and the UT, for catching a disease from Rhonda fixing her hair?”
- d. “Look, I read in earlier post, a lady caught herpes from Rhonda, and she hired Att. Meehan. I still wonder what happened...”
- e. “...Did Mark Leshner and Rhonda Long Leshner, think the victim would not tell her husband. Both know Jerry Coyel very well, they mooched off him for years. Did they think they could Rape Shannon, get her attorney to sue Jerry while they had her on drugs, and Jerry would do nothing...”

139. The statement involved a private matter.

140. Alternatively, the statement involved a public matter.

141. The statement referred to plaintiff by name.

142. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

143. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

144. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

145. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

146. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

147. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

148. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

149. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

150. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

151. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

152. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

153. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

154. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

155. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

156. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

157. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 207-212 - Defamation per se

158. Defendant's written statement(s) described in Counts 202-206 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

159. Further, Defendant's written statement(s) were defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

160. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

161. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

162. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 213-218 – Libel Per Se

163. Defendant's written statement(s) described in Counts 202-206 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

164. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 219-222 – Defamation

##### Betty

165. Defendant published a statement by written communication asserting as fact that,

a. "Yes Robert Lynn McCarver has just sunk Mark Lehsers ship...If he [Robert McCarver] aint careful Mark will get rid of him like he did Linda and her son!!!!"

b. "Everyone who screws Mark Leshner ends up his fall gaur/gal or done in. Which will Robert McCarver be??????? Mark's ship is just about to the bottom of the ocean lol"

c. "So how in the heck do u know the Leshners will be cleared where u a fly on the wall when they raped and drugged this lady or r they just gonna let the McCarver guy take the fall..."

d. “...I bet Mark is hot that Robert told the sheriff that Mark has been selling drugs to Ray for a very long time...Tell us about what really happened the night yall raped and drugged this lady?...”

166. The statement involved a private matter.

167. Alternatively, the statement involved a public matter.

168. The statement referred to plaintiff by name.

169. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

170. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

171. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

172. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

173. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

174. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

175. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

176. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

177. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

178. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

179. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

180. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs

incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 223-226 – Libel Per Se

181. Defendant’s written statement(s) described in Counts 219-222 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

182. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 227-231 - Defamation per se

183. Defendant’s written statement(s) described in Count 219-222 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

184. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

185. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

186. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 232 – Defamation

Bill Sharla Woods

187. Defendant published a statement by written communication asserting as fact that, “...Bill and Sharla, Mark and Rhonda[McCarver]Leshner enjoy 'ORGIES' at the bar above the 'UNIQUE TOUCH!'”

188. The statement involved a private matter.

189. Alternatively, the statement involved a public matter.

190. The statement referred to plaintiff by name.



191. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

192. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

193. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

194. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

195. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

196. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.

197. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

198. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 233 – Libel Per Se

199. Defendant's written statement(s) described in Count 232 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

200. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

### Count 234 - Defamation per se

201. Defendant's written statement(s) described in Count 232 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

202. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

### Count 235 – Defamation

Bob

203. Defendant published a statement by written communication asserting as fact that, "...Why was Robert McCarver living with the Leshers when they raped Shannon?"

204. The statement involved a private matter.

205. Alternatively, it involved a public matter.

206. The statement referred to plaintiff by name.

207. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

208. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

209. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

210. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

211. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

212. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshes's law practice, substantial damage to Rhonda Leshes's beauty salon, embarrassment, and ostracization within the community.

213. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

a. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).

More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 236 – Libel Per Se

214. Defendant’s written statement(s) described in Count 235 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

215. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 237 - Defamation per se

216. Defendant’s written statement(s) described in Count 235 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

217. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 238 – Defamation

##### Broke

218. Defendant published a statement by written communication asserting as fact that, “...all them Lesher McCarver 'PERVERTS' don't wont the truth posted.”

219. The statement involved a private matter.

220. Alternatively, the statement involved a public matter.

221. The statement referred to plaintiff by name.

222. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

223. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

224. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

225. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

226. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

227. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

228. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

229. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 239 – Libel per se

230. Defendant's written statement(s) described in Count 238 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

231. Further, Defendant's written statement(s) described in Count 238 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

232. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Count 240 - Defamation per se

233. Defendant's written statement(s) described in Count 239 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

234. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 241 – 244- Defamation BUDWEISER

235. Defendant published a statement by written communication asserting as fact that,

- a. "...I personally talked to D.J. An 11 year old boy and he tole me about the dope you gave his mother and the perverted stuff you wanted him to say...I promuse...I guive you my word you will not get by with what you have done. GOD have mercy on your sole because I won't."
- b. "...he [N.B., *Leshner*] should not have molested wife and kids..."
- c. "...When the gloves come off you will be the first to know...Me and Pick got a present for you that will lite up your perverted life..."
- d. "...Mike Rice, Rhonda and Mark Leshner and Rices wife twice his size all tied up in a knot with your 'HERPIES' dildos running? You lying bastard there is no court to file anything to. You will be punished you can bank on that. I swear I will make you a deal you can not refuse..."

236. The statement involved a private matter.

237. Alternatively, the statement involved a public matter.

238. The statement referred to plaintiff by name and/or indirectly.

239. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

240. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

241. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

242. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

243. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

244. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

245. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

246. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

247. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

248. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.

249. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

250. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 245 – 248 - Defamation per se

251. Defendant's written statement(s) described in Counts 241-244 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

252. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

253. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

254. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 249-253 – Libel per se

255. Defendant’s written statement(s) described in Counts 241-244 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

256. Further, Defendant’s written statement(s) described in Counts 241-244 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

257. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Counts 254-255 - Defamation  
Budweiser

258. Defendant published a statement by written communication asserting as fact that,

- a. “...McCarver confessed to their guilt!...outher...Robert Lynn McCarver, outh charges...A 'ROPE' is what McCarver needs, not an Attorney!”
- b. “...this 'TRIO OF TRASH'...Robert McCarver has confessed ad you still like...scumb...”

259. The statement involved a private matter.

260. Alternatively, it involved a public matter.

261. The statement referred to plaintiff indirectly.

262. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

263. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

264. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

265. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

266. Defendant is strictly liable because his allegation concerns a private issue and a private

Plaintiff.

267. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

268. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

269. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 256-257 – Libel Per Se

270. Defendant's written statement(s) described in Count 254-255 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

271. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 258-259 - Defamation per se

272. Defendant's written statement(s) described in Counts 254-255 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

273. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 260-262 – Defamation

##### Bugs

274. Defendant published a statement by written communication asserting as fact that,



- a. “I understand why you support the Leshers, where would you get DRUGS', 'ORGIES'...outher...”
  - b. “Packages from Rhondas 'UNIQUE TOUCH!' Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”
  - c. “'TRIO OF TRASH' face 'LIFE SENTENCE'!...McCarver confessed to their guilt!...”
275. The statement involved a private matter.
276. Alternatively, the statement involved a public matter.
277. The statement referred to plaintiff by name and/or indirectly.
278. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
279. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
280. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
281. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.
282. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.
283. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.
284. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.
285. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
286. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
287. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.
288. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

289. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

290. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

291. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

292. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

293. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

294. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

295. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

296. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

297. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 263-265- Defamation per se

298. Defendant's written statement(s) described in Counts 260-262 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

299. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

300. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

301. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

302. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

303. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 266-268 – Libel Per Se

304. Defendant's written statement(s) described in Counts 260-262 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

305. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 269 – Defamation Buzzard Puke

306. Defendant published a statement by written communication asserting as fact that, "...What you Leshers don't realize, JERRY COYEL us the WALL of STEEL!!! You won't get passed, So Leshers fo scratch the crabs around yo' ass!!!"

307. The statement involved a private matter.

308. Alternatively, the statement involved a public matter.

309. The statement referred to plaintiff by name.

310. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

311. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

312. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

313. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

314. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

315. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

316. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

317. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 270 – Libel Per Se

318. Defendant's written statement(s) described in Count 269 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

319. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 271 - Defamation per se

320. Defendant's written statement(s) described in Count 269 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

321. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 272-274 – Defamation  
challenge

322. Defendant published a statement by written communication asserting as fact that,
- a. “...the Leshers...self gratifying sex at any cost or anyones expense.”
  - b. “When they [*n.b. The Leshers and McCarver*] got to jail there will be three less people in the GROUP sex community”
  - c. “...Even the bible sats on should not have sex with the same sex.. AND the Leshers do it all the time.. Rhonda is well known for her perference for sex with another woman. And Mark is well known for watching and participating in three somes with her and her make and female lovers...”
323. The statement involved a private matter.
324. Alternatively, the statement involved a public matter.
325. The statement referred to plaintiff by name and/or indirectly.
326. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
327. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
328. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
329. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
330. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
331. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshers’s law practice, substantial damage to Rhonda Leshers’s beauty salon, embarrassment, and ostracization within the community.
332. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
333. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs

incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 274-276 - Defamation per se

334. Defendant's written statement(s) described in Count 272-274 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

335. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 277-279 – Libel Per Se

336. Defendant's written statement(s) described in Count 272-274 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

337. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 280-281 – Defamation

##### Cinco 2

338. Defendant published a statement by written communication asserting as fact that,

a. "...The only reason anyone would 'STUDY THE LESHERS EVERY MOVE' is to make sure the 'CHICKEN SH\*T' could not run or hide!... These "PERVERTS' have to be on 'DRUGS'!..."

b. "...Now these Lesher, 'ROBERT MCCARVER' 'PERVERTS' will be trying to find these Cows and 'TONGUE' their 'BUTTS!'"

339. The statement involved a private matter.

340. Alternatively, the statement involved a public matter.
341. The statement referred to plaintiff by name.
342. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
343. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
344. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
345. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
346. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
347. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
348. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
349. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
350. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
351. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
352. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
353. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 282-283 – Libel Per Se

354. Defendant’s written statement(s) described in Counts 280-281 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

355. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 284-285 - Defamation per se

356. Defendant’s written statement(s) described in Counts 280-281 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

357. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

358. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

359. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 286-287 – Defamation

##### Collin County slaughter

360. Defendant published a statement by written communication asserting as fact that,

a. “These Lesher, 'MCCARVER' supporters, get 'DRUGS' from them, 'PARTY' with them...at their 'ORGIE BAR' above the 'UNIQUE TOUCH'. They are 'DISEASE' infested and this must affect their brain...When this 'TRIO OF TRASH' fo to Jail, where will they get 'DRUGS', have 'ORGIES' who will run the 'VIBRATOR' when Rhonda is gone?”



b. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

361. The statement involved a private matter.

362. Alternatively, the statement involved a public matter.

363. The statement referred to plaintiff by name.

364. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

365. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

366. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

367. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

368. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

369. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

370. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

371. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

372. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

373. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

374. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

375. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

376. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

377. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

378. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

379. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

380. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

381. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

382. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

383. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 288-289 - Defamation per se

384. Defendant's written statement(s) described in Count 286-287 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

385. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

386. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

387. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

388. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

389. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 290-291 – Libel Per Se

390. Defendant's written statement(s) described in Counts 286-287 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

391. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 292-293 – Defamation copy this

392. Defendant published a statement by written communication asserting as fact that,

a. "...the Leshers are nothing but Cowards and Women abusers..They never stand up to a man except to hand over drugs..."

b. "Good morning all. This is the real ilbedipt and I am not lou and never have been. I just try to gather the best info we can gather. I do have the same agenda as lou ,however. I want to see that the Leshers and McCarver get what us deserved in this case. I want to see them in prison for their crime against a helpless woman that ,thought she was being helped as a friend .... not used as a pawn or sex toy...Robert McCarvers confession is proof that it happened and has in fact condemned the Leshers..."

393. The statement involved a private matter.

394. Alternatively, the statement involved a public matter.

395. The statement referred to plaintiff by name.

396. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

397. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

398. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

399. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

400. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

401. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

402. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

403. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

404. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

405. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

406. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

407. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 294-295 – Libel Per Se

408. Defendant's written statement(s) described in Count 294-295 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

409. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 296-297 - Defamation per se

410. Defendant's written statement(s) described in Counts 294-295 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

411. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

412. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

413. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 298-313 – Defamation  
Courthouse Mouse

414. Defendant published a statement by written communication asserting as fact that,

a. “Rhonda[Long]Leshner was giving 'HEAD' to a Leshner, McCarver supporter when she sucked a big scab off his 'HERPIES' infested prick, the 'SLUT' dam neat choked to death!!!!Mark Leshner gave Rhonda mouth to mouth to help her breath, then a big scab came off Rhondas 'HERPIES' infested mouth then he dam near choked to death!!!!!!!!!!!!”

b. “...why do you think the F.B.I., State Police and others want this scumb. These Leshners are 'PERVERTED' 'SLIMY' 'HERPIES' 'AIDS' infested pieces of shit!!!!!!!!!!!!”

c. “...scumb'...'DRUGS', 'ORGIES' 'PERVISION'...'HERPIES', 'AIDS'...'CHILD MOLESTERS' 'WOMEN RAPIST'...'SCUMB'!!!!!!!!!!!!...”

d. “...Two different Grang Juries indicted this scumb after hearing evidence from several people. Mark Leshner tried to get an 11 year old boy to say he saw his step father have sex with his sister and had the boy play with himself while the father watched. This was testified to in court by D.J. Coyel.Leshner hand wrote and typed a letter saying Judge Jim Lovett had sex with Jerrys ex wife and was a moroless Judge...This piece of shit Leshner will go to Jail and be disbareed...Leshner McCarver Perverted Child Molesting 'SCUMB'!!!!!!!!!!!!...”

- e. “How many more people will this 'SCUMB' infect before they go to Jail?????????”
- f. “...Nobody, I mean nobody should get by with drugging a woman, raping her and doing what he did to an 11 year old kid...”
- g. “...The taped confession, witness statements about drugs and many things on the Leshers will put this slime away...They are why this scumb will go to Jail!...”
- h. “‘YOU’ are a lying piece of shit!...YOU Lesher McCarver Perverted scumb hate it we tall ‘FACTS’ and you lie and suck.”
- i. “‘If I wanted to see a ‘QUEER’ and a ‘SLUT’ i could go to Leshers!’”
- j. “How could one let one with ‘HERPIES’ mouth, and disease infested touch them?????’UNIQUE TOUCH’ Thats for sure!!!!!!!!!!!!”
- k. “...‘SUCKED ANY MORE SCABS OFF LESHERS PRICK?’”
- l. “Look at her nasty mouty!
- m. “...Rhonda[Long}Lesher sucked and bit her vigena while she was out. What about the 11 year old boy D.J.?...scumb...You are a perverted piece of shit!!!!!!!!!!!!”
- n. “MARK LESHES IN THE HOSPITAL, HIS BUTT HOLE IS TORE UP, AND EAT UP WITH ‘HERPIES!’”
- o. “LOOK AT RHONDA[LONG]LESHER CLOSE, HER MOUTH IS ALL BROKE OUT IN SORES, AND LOOKS LIKE A BUTT HOLE. SHE LOOKS DEFORMED.”
- p. “MY BROTHER GOT IT FROM THEM [*n.b. The Leshers*]!!!!!!!!!!!!”

- 415. The statement involved a private matter.
- 416. Alternatively, the statement involved a public matter.
- 417. The statement referred to plaintiff by name and/or indirectly.
- 418. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
- 419. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
- 420. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
- 421. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.
- 422. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.
- 423. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.
- 424. Additionally and/or alternatively, the statement was defamatory because it

unambiguously accused the Plaintiff of committing a crime.

425. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

426. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

427. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

428. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

429. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

430. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

431. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

432. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

433. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

434. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

435. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

436. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

437. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the

issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 314-329 - Defamation per se

438. Defendant's written statement(s) described in Count 298-313 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

439. Further, Defendant's written statement(s) were defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

440. Further, Defendant's statement(s) were defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

441. Further, Defendant's written statement(s) were defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

442. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

443. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 330- 345 – Libel per se

444. Defendant's written statement(s) described in Counts 298-313 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

445. Further, Defendant's written statement(s) described in Count 298-313 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

446. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 346-347 – Defamation Criminal Minds

447. Defendant published a statement by written communication asserting as fact that,



- a. “Mark Lesher is the 'ANTICHRIST' has had the F.B.I. After him ...scumbs...'PERVISION'...moreless...”
- b. “Rhonda [Long} Lesher, 'ROBERT MCCARVER' and Mark Lesher should get life, without parole! Why would educated people 'DRUGG' and 'RAPE' a woman? Only for their 'PERVERTED' pleasure, and their insane sexual pleasure...'VICTOMS'...”
448. The statement involved a private matter.
449. Alternatively, the statement involved a public matter.
450. The statement referred to plaintiff by name.
451. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
452. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
453. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
454. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
455. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
456. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
457. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
458. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
459. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
460. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.
461. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
462. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles

plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 348-349 – Libel per se

463. Defendant’s written statement(s) described in Counts 346-347 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

464. Further, Defendant’s written statement(s) described in Counts 346-347 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

465. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 350-351 - Defamation per se

466. Defendant’s written statement(s) described in Count 346-347 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

467. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

468. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

469. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 352-356 – Defamation

Debra

470. Defendant published a statement by written communication asserting as fact that,
- a. "...They will all get Jail time, and lots of it. 'THIS I PROMISE YOU!'"
  - b. "This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."
  - c. "...Mark Lescher and Rhonda (Long)Lescher held the wife of a citizen on Red Rover county captive through the use of drugs some legal sedatives and some illegal drugs...There is much more in the documents-THAT'S RIGHT—COURT DOCUMENTS TO BACK UP WHAT WAS JUST STATED..."
  - d. "...'DRUGS', 'PERVERSION', 'FRIVOLOUS LAW SUITS', 'RAPE', 'CHILD MOLESTING', etc.! These 'CRIMINALS belong behind bars..."
  - e. "...Rhonda{Long} Lesher, Ricky Longs sister 'SUCKED' ans 'BIT' the victims 'VAGINA' then Robert McCarver and Mark Lesher raped her. McCarver has confessed to D.A. and Sheriff. Mark Leshers Lawyers are trying to get the confession thrown out!"
471. The statement involved a private matter.
472. Alternatively, the statement involved a public matter.
473. The statement referred to plaintiff by name and/or indirectly.
474. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
475. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
476. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
477. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.
478. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
479. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
480. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.
481. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of committing a crime by innuendo.

482. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

483. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

484. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

485. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

486. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

487. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

488. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

489. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 357-361 - Defamation per se

490. Defendant's written statement(s) described in Counts 352-356 were defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

491. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

492. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

493. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

494. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 362-366 – Libel per se

495. Defendant’s written statement(s) described in Count 352-356 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

496. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

497. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 367-369 – Defamation devils advocate

498. Defendant published a statement by written communication asserting as fact that,

a. “...Rhonda is also a 'FOOL' she already has lied in court! Court dockments prove that. This 'TRIO OF TRASH' will go to Jail and my kin cain't waite!”

b. “...Rhonda[McCarver]Lesher gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhar Mark Lesher and 'ROBERT MCARVER' raped her!...”

c. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Lesher! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”

499. The statement involved a private matter.

500. Alternatively, the statement involved a public matter.

501. The statement referred to plaintiff by name.

502. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

503. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
504. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
505. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
506. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
507. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
508. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
509. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
510. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
511. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
512. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
513. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
514. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
515. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
516. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
517. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 370-372 – Libel per se

518. Defendant’s written statement(s) described in Count 367-369 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

519. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

520. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 373-375 - Defamation per se

521. Defendant’s written statement(s) described in Count 367-369 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

522. Further, Defendant’s written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

523. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

524. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

525. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 376-377- Defamation Disease

526. Defendant published a statement by written communication asserting as fact that,
- a. “If you know anyone that was infected be Robert McCarver, Rhonda[Long]Leshner or Mark Leshner please call your local health department. These are incurable diseases. Call Att. Dan Mehan Clarksville Texas for legal advice!”
  - b. “If you know anyone that was infected be Robert McCarver, Rhonda[Long]Leshner or Mark Leshner please call your local health department. These are incurable diseases. Call Att. Dan Mehan Clarksville Texas for legal advice!”
527. The statement involved a private matter.
528. Alternatively, the statement involved a public matter.
529. The statement referred to plaintiff by name.
530. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.
531. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.
532. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.
533. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.
534. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
535. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.
536. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
537. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law)



necessary to support a finding of exemplary damages.

#### Counts 378-379 – Defamation per se

538. Defendant’s written statement(s) described in Count 376-377 were defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

539. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 380-381 – Libel Per Se

540. Defendant’s written statement(s) described in Counts 376-377 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

541. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 382 – Defamation

Duh

542. Defendant published a statement by written communication asserting as fact that, “...A lady that works at unique touch said rhonda mark lesher and mike rice were taking turns watching topix comments...there so stupid they still don't realize this will not keep them out of jail...They know exactly what their talking about because their the ones that committed the crimes...”

543. The statement involved a private matter.

544. Alternatively, it involved a public matter.

545. The statement referred to plaintiff by name.

546. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

547. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

548. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

549. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

550. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

551. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

552. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

553. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 383 - Defamation per se

554. Defendant's written statement(s) described in Count 382 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

555. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 384 – Libel Per Se

556. Defendant's written statement(s) described in Count 382 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

557. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 385-388 – Defamation  
Engineer lou

558. Defendant published a statement by written communication asserting as fact that,

- a. “I want to make a personal appology to 'RHONDA LONG'! I knew Shannon was telling the truth about the 'RAPE' and D.J. COYEL 11 year old told me what Leshner had done, and saw Leshner give his mother 'DRUGS'!...”
- b. “I have heard from Rhonda Longs close friends, Mark Leshner gives Rhonda 'DRUGS' and has her do 'PERVERTED' Things'...outher...'SCUMBS'...”
- c. “Wonder if Leshner realizes yet, he molested and drugged the wrong man's family? The worst is yet to come!!!”
- d. “Mark Leshners “LOVER'! Wonder if 'ROBERT MCCARVER' is Jealous?'NAW' They have a threesome and the 'AIDS' and 'HERPIES' fly!

559. The statement involved a private matter.

560. Alternatively, the statement involved a public matter.

561. The statement referred to plaintiff by name.

562. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

563. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

564. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

565. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

566. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

567. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

568. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

569. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

570. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

571. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

572. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

573. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

574. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

575. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

576. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

577. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 389-392 - Libel per se

578. Defendant's written statement(s) described in Counts 385- 388 were libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

579. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

580. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 393-396 - Defamation per se

581. Defendant's written statement(s) described in Count 385-388 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

582. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

583. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

584. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

585. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 397 – 398 – Defamation

##### ET tornado

586. Defendant published a statement by written communication asserting as fact that,

a. “What I talk about was done to the Victom by the 'TIRO OF TRASH'!...Rhonda, while the victom was 'DRUGGED' performed Oral Sex on her, 'SUCKING' and 'BITING' her Vagina. Mark and McCarver were playing with their self and each outhar then 'RAPED' her! 'ROBERT MCCARVER'has 'CONFESSED' to this to the DA and Sheriff! McCarver also 'BRAGGED' while in Jail how the Victom went 'BERZERK'! McCarver also 'CONFESSED' about dealing 'DRUGS' for Mark Lesher!...”

b. “...Look t Rhondas 'TONGUE'! Can you imagine her 'TONGUE' up your 'BUTT'!...'HERPIES' 'AIDS'”

587. The statement involved a private matter.

588. Alternatively, the statement involved a public matter.

589. The statement referred to plaintiff by name.

590. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
591. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
592. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
593. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
594. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
595. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
596. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
597. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
598. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
599. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
600. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
601. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
602. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
603. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
604. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

605. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 399 – Defamation  
Exactly

606. Defendant published a statement by written communication asserting as fact that, “Mark and Ronda Lesher filling bellies with 'SPERM'...before I went to the pen.”

607. The statement involved a private matter.

608. Alternatively, the statement involved a public matter.

609. The statement referred to plaintiff by name.

610. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

611. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

612. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

613. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

614. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

615. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

616. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

617. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles

plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 400 – Libel Per Se

618. Defendant’s written statement(s) described in Count 399 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

619. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 401 - Defamation per se

620. Defendant’s written statement(s) described in Count 399 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

621. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 402 fact

622. Defendant published a statement by written communication asserting as fact that, “...RECORDING BETWEEN Mark Leshar AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!...”

623. The statement involved a private matter.



624. Alternatively, the statement involved a public matter.
625. The statement referred to plaintiff by name.
626. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
627. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
628. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
629. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
630. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
631. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
632. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
633. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
634. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
635. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
636. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
637. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the

issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 403 - Defamation per se

638. Defendant's written statement(s) described in Count 402 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

639. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

640. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

641. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 404 – Libel Per Se

642. Defendant's written statement(s) described in Count 402 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

643. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 405-408

##### Facts

644. Defendant published a statement by written communication asserting as fact that,

a. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshner! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

b. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshner! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

c. "...'HERPIES' and 'AIDS'...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here ...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

d. “...At clarksville court house today F.B.I. And others met about lesher and soon he will be arrested again shortly...”

645. The statement involved a private matter.

646. Alternatively, the statement involved a public matter.

647. The statement referred to plaintiff by name.

648. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

649. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

650. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

651. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

652. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

653. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

654. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

655. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

656. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

657. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshers law practice, substantial damage to Rhonda Leshers beauty salon, embarrassment, and ostracization within the community.

658. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

659. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 409-412 - Defamation per se

660. Defendant's written statement(s) described in Counts 405-508 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

661. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

662. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

663. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 413-416 Libel Per Se

664. Defendant's written statement(s) described in Count 405-408 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

665. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 417-420 facts

666. Defendant published a statement by written communication asserting as fact that,

a. "...Rhonda...is telling all that will listen to her, anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her, because she is not black and that only white people are her

peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHES...thier...several had witnesses the fight between her and Mark over ROBERT McCarver...Rhonda Leshes now has insulted the Grand Jury..."

b. "...we have orgies at the bar above Uniquit Touch. We might have 'HERPIES' and 'AIDS' but that is nobodyies business..."

c. "...RECORDING BETWEEN Mark Leshes AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshes 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!..."

d. "...'HERPIES' and 'AIDS'...RECORDING BETWEEN Mark Leshes AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshes 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!..."

667. The statement involved a private matter.

668. Alternatively, the statement involved a public matter.

669. The statement referred to plaintiff by name and/or indirectly.

670. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

671. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

672. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

673. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

674. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

675. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

676. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

677. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

678. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

679. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

680. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

681. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

682. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

683. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

684. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

685. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 421-424 - Defamation per se

686. Defendant's written statement(s) described in Counts 417-420 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

687. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

688. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

689. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

690. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 425-428 – Libel Per Se

691. Defendant’s written statement(s) described in Counts 417-420 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

692. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 429-432 – Defamation

##### Fate

693. Defendant published a statement by written communication asserting as fact that,

a. “I finally figured out what is wrong with these Lesher,McCarver 'PERVERTS'! I thought 'HERPIES' and 'AIDS' had made them 'BRAIN DEAD', but now I think all that 'SUCKING' and swallowing helped these 'PERVERTS' go crazy!”

b. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

c. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

d. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

694. The statement involved a private matter.

695. Alternatively, the statement involved a public matter.

696. The statement referred to plaintiff by name and/or indirectly.

697. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

698. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

699. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by implication.

700. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

701. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

702. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

703. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

704. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

705. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

706. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

707. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

708. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

709. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

710. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

711. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

712. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

713. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

714. Defendant's false statement caused injury to plaintiff, including substantial damage to



Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

715. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

716. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 433-436 – Libel Per Se

717. Defendant's written statement(s) described in Counts 429-432 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

718. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 437-440 Defamation per se

719. Defendant's written statement(s) described in Counts 429-432 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

720. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

721. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

722. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 441-446 – Defamation  
floyd

723. Defendant published a statement by written communication asserting as fact that,
- a. “...Guess he [Mark Leshner] spent all he stole off the main street project on 'VALTREX'.”
  - b. “...She [N.B. *Rhonda Leshner*] will be tried for purgery that is a known fact...”
  - c. “...Don't forget about the 'HERPIES'Even if she can suck a golf ball through a fifty foot water hose.”
  - d. “All with 'HERPIES’”
  - e. “Found out Wow and Rhonda tied in the event they had at unique touch, they both sucked a golf ball through a 100 foot water hose and swallowed it.”
  - f. “...You think Leshners can rape, sell and grow drugs do whatever they wish...”
724. The statement involved a private matter.
725. Alternatively, the statement involved a public matter.
726. The statement referred to plaintiff by name and/or indirectly.
727. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
728. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
729. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
730. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
731. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
732. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
733. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
734. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
735. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

736. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

737. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

738. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

739. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

740. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

741. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

742. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 447-452 - Defamation per se

743. Defendant's written statement(s) described in Counts 441-446 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

744. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

745. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

746. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

747. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 453-458 – Libel per se

748. Defendant’s written statement(s) described in Counts 441-446 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

749. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

750. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Count 449 – Defamation  
for losers

751. Defendant published a statement by written communication asserting as fact that, “The truth s Leher, McCarver and their followers are for real 'QUEERS!' 'CHILD MOLESTERS', 'WHITE PERVED TRASH!'”

752. The statement involved a private matter.

753. Alternatively, the statement involved a public matter.

754. The statement referred to plaintiff by name.

755. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

756. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

757. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

758. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

759. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of committing a crime by innuendo.

760. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

761. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

762. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

763. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

764. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

765. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

766. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 450 - Defamation per se

767. Defendant's written statement(s) described in Count 449 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

768. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

769. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

770. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 451 – Libel Per Se

771. Defendant’s written statement(s) described in Count 449 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

772. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 452 – Defamation  
for Losers

773. Defendant published a statement by written communication asserting as fact that, “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!...”

774. The statement involved a private matter.

775. Alternatively, the statement involved a public matter.

776. The statement referred to plaintiff by name and/or indirectly.

777. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

778. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

779. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

780. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

781. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

782. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

783. The statement was false because Plaintiff does not have the loathsome disease imputed

by the Defendant.

784. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

785. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

786. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

787. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

788. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 453 – Libel Per Se

789. Defendant's written statement(s) described in Count 452 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

790. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 454 - Defamation per se

791. Defendant's written statement(s) described in Count 452 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

792. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

793. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

794. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 455-458 – Defamation  
for LOSERS

795. Defendant published a statement by written communication asserting as fact that,

a. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”

b. “...But don't forget about the 'HERPIES' and 'AIDS'! ...”

c. “Wonder how many 'RIM JOBS' Rhonda has given to fertilize this tongue?”

d. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”

796. The statement involved a private matter.

797. Alternatively, the statement involved a public matter.

798. The statement referred to plaintiff by name and/or indirectly.

799. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

800. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

801. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

802. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

803. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

804. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.



805. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

806. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

807. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

808. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

809. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

810. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 459-462 - Defamation per se

811. Defendant's written statement(s) described in Counts 455-458 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

812. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

813. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

814. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 463-466 – Libel Per Se

815. Defendant's written statement(s) described in Counts 455-458 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

816. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 467 – Defamation  
forthe fool

817. Defendant published a statement by written communication asserting as fact that, "...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."

818. The statement involved a private matter.

819. Alternatively, the statement involved a public matter.

820. The statement referred to plaintiff by name and/or indirectly.

821. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

822. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

823. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

824. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

825. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

826. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

827. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

828. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiff of conduct that injured his and/or her professional occupation.

829. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

830. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

831. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

832. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

833. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

834. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

835. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

836. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 468- Defamation per se

837. Defendant's written statement(s) described in Count 467 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

838. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

839. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

840. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

841. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 469 – Libel Per Se

842. Defendant’s written statement(s) described in Count 467 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

843. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 470 – Defamation Gale

844. Defendant published a statement by written communication asserting as fact that, “...LINDA VELVIN' was Mark Leshers common Law Wife, Lesher let her take the rap then moved Rhonda[long]Lesher in...Linda Velvin was Mark Leshers last fall guy...What Robert McCarver, Rhonda[Long]Lesher is doing, Rape, pervision, spreading 'HERPIES'...Mark Lesher the 'ANTICHRIST' has had the F.B.I. after him...”

845. The statement involved a private matter.

846. Alternatively, the statement involved a public matter.

847. The statement referred to plaintiff by name.

848. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

849. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

850. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

851. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

852. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

853. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

854. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

855. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

856. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

857. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

858. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

859. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

860. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

861. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

862. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

863. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 471 - Defamation per se

864. Defendant's written statement(s) described in Count 470 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

865. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

866. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

867. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

868. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 472 – Libel per se

869. Defendant's written statement(s) described in Count 471 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

870. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

871. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Counts 473 – 474 – Defamation  
GaleWhite

872. Defendant published a statement by written communication asserting as fact that,

a. "...The victim, Shannon Coyel with an excellent history, until Leshers and McCarver gave her drugs..."

b. "...'DRUGS', 'RAPE', 'PERVISION'!!!!!!!!Mo re charges to come!!!!!!!!!!..." "

873. The statement involved a private matter.

874. Alternatively, the statement involved a public matter.
875. The statement referred to plaintiff by name and/or indirectly.
876. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
877. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
878. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
879. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
880. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
881. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
882. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
883. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
884. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
885. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
886. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
887. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the

issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 475-476– Libel Per Se

888. Defendant’s written statement(s) described in Count 473-474 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

889. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 477-478 - Defamation per se

890. Defendant’s written statement(s) described in Count 473-474 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

891. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

892. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

893. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 479 – Defamation Getitrite

894. Defendant published a statement by written communication asserting as fact that, “...It was the DRUGS MARK LESHER was giving her...”

895. The statement involved a private matter.

896. Alternatively, it involved a public matter.

897. The statement referred to plaintiff name.

898. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

899. Additionally and/or alternatively, the statement was defamatory because it accused the



Plaintiffs of committing a crime by innuendo.

900. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

901. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

902. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

903. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

904. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

905. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 480 – Libel Per Se

906. Defendant's written statement(s) described in Count 479 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

907. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 481 -- Defamation per se

908. Defendant's written statement(s) described in Count 479 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This

type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

909. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 482 – Defamation  
gober goblers

910. Defendant published a statement by written communication asserting as fact that, “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!... 'HERPIES'...”

911. The statement involved a private matter.

912. Alternatively, it involved a public matter.

913. The statement referred to plaintiff name.

914. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

915. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

916. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

917. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

918. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

919. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

920. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

921. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

922. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

923. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

924. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

925. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

926. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

927. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

928. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

929. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 483 - Defamation per se

930. Defendant's written statement(s) described in Count 482 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

931. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

932. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

933. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

934. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 484 – Libel Per Se

935. Defendant’s written statement(s) described in Count 482 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

936. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 485 – 492 – Defamation GUT WAGON

937. Defendant published a statement by written communication asserting as fact that,

a. “...Local attorney 'DRUG' dealer and'SLUT' bug infested, disease ridden wife Ronda...indicted os sexual assault charges...After reading hand written papers and numerous witness statements hand written documents written by Mark Leshner...more charges to come...”

b. “There is a lot more charges coming 'You can bank on that'...You are going to get your sorry ass drug through court until you bled to death...”

c. “If I was mark leshner I would turn myself in and tell all, about Rape,making drugs, selling drugs, and weed leshner sold to ray price and others,...that I promuse you...”

d. “..Ronda slut Leshner you and fag Mark went to jail not Jerry Coyel...just jelious and a bunch of perveted white trash...”

e. “...robert mccarver has and is staying at your house having sex with you and fag. Mark while yall watch each other...You are the ones that went to jail and are going back dummy...”

f. “I was there [at Rotary Club] too how do you think I knew? Ronda is one with sexual problems she was arested not me...”

g. “Leshner you pissed the wrong people off with your pervision...”

h. “Thought he was above the law, messed with the wrong guys wife and kids. Leshner says I will sue cause I cant get caught caught I am a pervert but you cant prove it so is ronda we got away with it for years ill sue. I hope he does I need the work.”

938. The statement involved a private matter.

939. Alternatively, the statement involved a public matter.

940. The statement referred to plaintiff by name and/or indirectly.

941. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
942. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
943. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
944. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
945. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
946. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
947. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
948. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
949. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
950. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
951. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
952. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
953. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
954. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
955. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

956. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 493 – 500 — Libel Per Se

957. Defendant's written statement(s) described in Counts 485-492 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

958. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 501 – 508 Count - Defamation per se

959. Defendant's written statement(s) described in Counts 485-492 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

960. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

961. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

962. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

963. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 509- Defamation

haha

964. Defendant published a statement by written communication asserting as fact that,

“ROBERT MCCARVER' ain't doing me, he doing 'RHONDA {MCCARVER} LESHER'...”

965. The statement involved a private matter.
966. Alternatively, the statement involved a public matter.
967. The statement referred to plaintiff by name.
968. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
969. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
970. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
971. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
972. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
973. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.
974. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
975. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 510 - – Libel Per Se

976. Defendant’s written statement(s) described in Count 509 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

977. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 511 - Defamation per se

978. Defendant's written statement(s) described in Count 509 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

979. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 512-513 – Defamation  
Hellcat

- a. Defendant published a statement by written communication asserting as fact that,
- b. “And the rest of the story: Everything changed after she [*n.b. Shannon Coyel*] was Unwillingly used for sex by the Leshers and their 'criminal and drug addict' partner, McCarver.”
- c. “She's [*n.b. Rhonda Lesher*] a nice looking slut, for her age, going by her picture in the Gazette.”

980. The statement involved a private matter.

981. Alternatively, the statement involved a public matter.

982. The statement referred to plaintiff by name and/or indirectly.

983. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

984. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

985. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

986. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

987. Additionally and/or alternatively, the statement was defamatory because it accused the



Plaintiffs of committing a crime by innuendo.

988. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

989. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

990. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

991. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

992. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

993. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

994. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 514-515 - Defamation per se

995. Defendant's written statement(s) described in Count 512-513 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

996. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

997. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

998. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 516-517 – Libel Per Se

999. Defendant’s written statement(s) described in Count 514-515 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1000. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 518-526 – Defamation  
Helldog

1001. Defendant published a statement by written communication asserting as fact that,

a. “...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!...”

b. “...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!...”

c. “You got to see her [*n.b. Rhonda Leshner*] in person, mouth sores, and ragged looking.”

d. “...With McCarvers 'CONFESSION' and outhere testimony this will be a grand slam!”

e. “...McCarver 'CONFESSED' , this 'TRIO OF TRASH' will go to Jail!...'BUDWEISER' is with me...”

f. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

g. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

h. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

i. “...Rhonda...is telling all that will listen to her, anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her, because she is not black and that only white people are her

peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHER...Rhonda Lesher now has insulted the Grand Jury..."

1002. The statement involved a private matter.

1003. Alternatively, the statement involved a public matter.

1004. The statement referred to plaintiff by name and/or indirectly.

1005. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1006. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1007. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1008. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1009. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1010. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1011. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1012. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1013. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1014. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1015. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1016. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1017. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1018. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1019. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1020. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1021. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1022. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1023. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1024. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 527-535 - Defamation per se

1025. Defendant's written statement(s) described in Count 518 - 526 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1026. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1027. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1028. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1029. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1030. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 536-544– Libel Per Se

1031. Defendant's written statement(s) described in Counts 518-526 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1032. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### 545-546 – Defamation Helldog – original

1033. Defendant published a statement by written communication asserting as fact that,

a. “The below letter was part of a motion filed by McCarver's attorney...The Pre-Test Briefing: ...In brief, Ms. Coyel alleged to law enforcement authorities that on or about July 26, 2007 Mr. McCarver engaged in sexual intercourse with her in a room occupied at the time by Rhonda Leshner and her husband Mark Leshner. Ms. Coyel maintained that she was given drugs at the Leshner Ranch that day which she ingested...”

b. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

1034. The statement involved a private matter.

1035. Alternatively, the statement involved a public matter.

1036. The statement referred to plaintiff by name.

1037. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1038. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1039. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1040. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1041. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1042. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1043. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1044. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

1045. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

1046. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1047. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1048. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1049. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1050. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1051. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1052. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs

incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 547-548 Defamation per se

1053. Defendant's written statement(s) described in Count 545-546 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1054. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1055. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1056. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1057. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 549-550 – Libel Per Se

1058. Defendant's written statement(s) described in Count 545-546 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1059. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 551 – Defamation HenLesCarver

1060. Defendant published a statement by written communication asserting as fact that, “This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...””

1061. The statement involved a private matter.

1062. Alternatively, the statement involved a public matter.

1063. The statement referred to plaintiff by name and/or indirectly.

1064. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1065. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1066. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1067. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1068. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1069. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1070. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

1071. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1072. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1073. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

1074. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.



1075. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 552– Libel Per Se

1076. Defendant's written statement(s) described in Count 551 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1077. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 553- Defamation per se

1078. Defendant's written statement(s) described in Count 551 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1079. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1080. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1081. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 545 – Defamation

HillBilly

1082. Defendant published a statement by written communication asserting as fact that, "...yea those 3 perverts are going to get whats coming to them if not us inbreed backards country folks wil take care of them"
1083. The statement involved a private matter.
1084. Alternatively, the statement involved a public matter.
1085. The statement referred to plaintiff indirectly.
1086. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
1087. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
1088. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
1089. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
1090. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1091. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
1092. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
1093. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 555 – Libel Per Se

1094. Defendant's written statement(s) described in Count 554 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1095. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 556 - Defamation per se

1096. Defendant's written statement(s) described in Count 554 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1097. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 557 – Defamation

##### Hit a nerve

1098. Defendant published a statement by written communication asserting as fact that, "Call it what you want, I call it exterminating 'BUGS'!... 'ALL' 'CHILD MOLESTERS, 'RAPIST' 'DRUG DEALERS' are 'BUGS'!this includes Leshner and McCarver!"

1099. The statement involved a private matter.

1100. Alternatively, the statement involved a public matter.

1101. The statement referred to plaintiff by name.

1102. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1103. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1104. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1105. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1106. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of committing a crime by innuendo.

1107. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1108. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1109. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1110. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1111. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1112. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1113. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 558– Libel Per Se

1114. Defendant's written statement(s) described in Count 557 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1115. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 559- Defamation per se

1116. Defendant's written statement(s) described in Count 557 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1117. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1118. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1119. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 560 – Defamation  
Hogs

1120. Defendant published a statement by written communication asserting as fact that, "What Church does Rhonda and her 'PERVERTED' followers go to? Wonder how many are infested with 'DISEASES' from this 'TRIP OF TRASH'?"

1121. The statement involved a private matter.

1122. Alternatively, the statement involved a public matter.

1123. The statement referred to plaintiff by name.

1124. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1125. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1126. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1127. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1128. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1129. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1130. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1131. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1132. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1133. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1134. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1135. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 561 - Defamation per se

1136. Defendant's written statement(s) described in Count 560 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1137. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1138. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1139. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 562 – Libel Per Se

1140. Defendant's written statement(s) described in Count 560 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured

Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1141. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 563-564  
ibedarned

1142. Defendant published a statement by written communication asserting as fact that,

a. "The lou bashers just have to pick on someone, they know the Leshers have no defense what so ever. The followers of the Trio ,must really be in bad shapw to have todefend Women rapers and child molesters..."

b. "...thier...One would think they would not want sick people in thier\*community that would attack women and children...It seems like the Leshers have gathered the support of all those kinds in your area...Did I tell you all about the recordings of Robert McCarver ,telling all about the CRIME and describing how the victim freaked out when she realized what was happening to her?????...See that is why I know they will all go to prison.....And that is another reason know they are GUILTY...CHARLIE"

1143. The statement involved a private matter.

1144. Alternatively, the statement involved a public matter.

1145. The statement referred to plaintiff by name and/or indirectly.

1146. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1147. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1148. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1149. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1150. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1151. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1152. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1153. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1154. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1155. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1156. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1157. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 565-566– Libel Per Se

1158. Defendant's written statement(s) described in Count 563-564 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1159. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 567-568- Defamation per se

1160. Defendant's written statement(s) described in Count 563-564 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.



1161. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1162. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1163. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 569-674 – Defamation  
ilbedipt

1164. Defendant published statements by written communication asserting as fact that,

a. “Rhonda Leshner is a racist pig that SCREAMED that she should have been given a fair hearing at the Grand jury setting and that it should have been conducted by her PEERS. She stated that there were clack people on the Grand Jury and they are NOT her peers. No that is the FINE upstanding person that is going to trial for Aggravated Sexual Assault on a lady that Rhonda herself said they were only trying to help...”

b. “Good morning all. This is the real ilbedipt and I am not lou and never have been. I just try to gather the best info we can gather. I do have the same agenda as lou ,however. I want to see that the Leshners and McCarver get what us deserved in this case. I want to see them in prison for their crime against a helpless woman that ,thought she was being helped as a friend .... not used as a pawn or sex toy...Robert McCarvers confession is proof that it happened and has in fact condemned the Leshners...”

c. “...Mark Lescher and Rhonda (Long)Lescher held the wife of a citizen on Red Rover county captive through the use of drugs some legal sedatives and some illegal drugs...There is much more in the documents-THAT'S RIGHT—COURT DOCUMENTS TO BACK UP WHAT WAS JUST STATED...”

d. “...the Leshner trio of Mark Leshner ,his bi-sexual wife and ,drug runniner Robert McCarver rendered a lady incapacitated on drugs ,then sexually molested her for their own self gratifications...The law has a recorded statement from McCarver detailing the assault and the Leshners involvement and the involvement of Mark Leshner in illegal drug trafficking and names names and all...”

e. “...PERVERTS,Lesbians,Herpies,Chi ld Molesters,Women Molesters,Thieves, Greed,Commun ity Rapers,Moral Morons,and Value Degenerates in general.”

f. “Rhonda and Markwould go on out of town trips where Mark would call ESCORT services to service Rhonda while he watched then he would prform oral on the ladies...The Unique Touch is quite the lair for deviant sexual expectations I would assume.”

g. “I am sure the Jury will find it hard to believe that a person with the reputation like Robert McCarver has, is real believable. Nor that the Leshners propensity for unususl sex would stop them from this act.”

h. “lou you know Mark goes STRAIGHT..... STRAIGHT FOR THE little boys and men”

- i. “...Yet, the truth is they are sexual deviants that let their behaviour get out of control or they didn't have respect for others wishes. So, they drugged and assaulted an innocent woman to fulfill their own sadistic and lurid desires...”
- j. “...the attack on the lady while she was passed out on drugs,provided by her and Mark is inexcusable. She [*n.b. Rhonda Leshner*] was the one that was performing oral sex on the lady ,when the lady came to...But Rhonda has Knowingly accepted and Practiced the Bisexual lif style. SHE just crossed the line,here in this case from consensual sex to ASSAULT...”
- k. “...She [*n.b. Rhonda Leshner*] is just a HIGH maintenance person with strange and uncontrollable desires of the human flesh That in itself I not a crime. The crime she committed came about by greed and the self serving desire for sex with a non-consenting,at the time, adult...”
- l. “...These people thought they had the RIGHT and took their leave to have sex with this woman at their discretion because of the condition she was in. It seems as though the Leshers have an insatiable appetite for weird and unusual sex of various kinds...”
- m. “...she [*n.b. Shannon Coyle*] was molested by the Trio...”
- n. “...This this testimony will also provide the possibility of other crimes and charges of criminal action that could be filed after this trial. The defendants cannot defend thier actions without TESTIFYING themselves. This is where they will hang themselves...They got caught up in one of thier sordid sexual activities and didn't think about anyones Rights but just thier own perverted pleasures.”
- o. “...She actually contracted HSV-2,around her eyes, after a visit to U.T. where Rhonda did her hair...”
- p. “...She can bet her Valtrex Ol'Cinco is not going to tell the same story... Because someONE if not, all IS PRISON BOUND. LOOK up, RHONDA, that's you under the bus.”
- q. “When an ADULT of the court( any lawyer)mentally berates and coherses or encourages a child to lie to anyone about anything,especially a Judge ,it is considered a form of mental molestation.”
- r. “...after looking over the records and statements and so on, I can try to put this in perspective. There was a Hair test done on the Victim...In fact she has 3 test done at different times ,as instructed by Leshner. This was done in anticipation of the filing for DIVORCE case...the victims parents Bill and Sharla Woods filed to have the kids removed...Mark was thier advisor and co conspirator in the endeavor to discredit the victim and to extort money from her husband...The Expert said that the tests results were negative for certain drugs...First Leshner wants to use the TESTS to show the victim was drug free for the divorce. But with the POSSIBILITY of her making trouble for him ( after the assault occured), he devised a plan to get the test into a court record to PROVE there was no drugs in her system that might lend credit to her story of being drugged incoherent and assaulted.”
- s. “Ol'Cinco,alias PINKY,alias,MARK LESHER is seeking people to go to court to testify(lie under oath) that they were there at the time of the ,alleged, attack and state that it didn't happen and that the woman was not there at the time. Money will be awarded to those that are willing.(could this be real) The solicitation of this CRIME is being done by his good friend Mike Rice...so we hear. Obstruction of justice,Perjury and interfering with an on going investigation are very serious crime. I am sure these people realize that all the people associated with the Leshers are being watched METHODICALLY. SO beware if approached by them.”

- t. "The only UPDATE about GJ that may be coming is the NEWS that JURY tampering charges have been filed on MARK ,thePINKY,Lesher...See he was able to get a lost of the GJ pool list. Then he started calling them..."
- u. "...It seems as though ol is not the best endowed person for making love. 'more like a pinky than a penis'...Lawyer,DR.,Pharmacist,Inventor,Bartender,Rapist,Kidnapper, d rug dealer, OR KING. Maybe PRISONER will fit him well"
- v. "OH yes, it does seem that Mark the 'pinky'man is up to his Blasting cap ,with the dynamite deal."
- w. "...Remember it was Mark that had the lady sign over Power of Attourney to him, and it was Mark that had her sign a WILL form, while she was in a drugged state of mind..."
- x. "SHE surly knows how to spell self-incriminating and perjury"
- y. "...no wonder they can rape and abuse children and women with no remorse.. They think it's O.K."
- z. "...the accuser claims the defendants drugged her and that she passed out. Upon awakening ,she found Rhonda Lesher performing oral sex on her,while both Mark Lesher and Robert McCarver were fondling her and Rhonda at the same time...more will be told in court...Mark Lesher had Shannon sign many papers he said were needed by the court for the divorce case..."
- aa. "It is very interesting that Robert would take his child (shady mccarver) to Leshers home and office on many occasions...At best,he used her for cover in drug delivery..."
- bb. "The Lesher/McCarver connection to child abuse is too obvious to overlook. The Fact that mark Lesher's name comes up a lot in connection to illegal drug movement in Red River co is also unnerving..."
- cc. "...The two fellows that ran( during the Ricky Long drug bust) will be in Jail very soon, if not already...Guess who's name will pop up on this deal???? O.K. I'll give you a clue....M.L..."
- dd. "MIKE RICE is MARK LESHES ,COMPOUND Manager or hand or ,Seemingly ,BODY GUARD. Co CONSPIRATOR ....ooops .... I should not say that , for he has not been charged with anything ,,,,.....yet."
- ee. "I wish they would all get LIFE, as they deserve."
- ff. "...There is a lot of evedience to support her story and contradict the Lesher's story. There is a tape recording ( can't give details of it,here for obvious reasons). There is phone records. There is eye witnesses to times and events leading up to and after the assault..."
- gg. "June, 26,2007 is when this crime ocured. You will hear from the PEPROUP that it was not reported for NINE months or alsmost a YEAR as the peroup likes to tell it. When in actuality it was reported Three weeks after the attack...It only took about three weeks. The sheriff's office has the proof."
- hh. "I Charlie do here by state that MARK LESHES,RHONDA LESHES are without a doubt,CRIMINALS...They steal from people. They are selling drugs. They are molesting helpless people. They are completely untrustworthy. BEWARE...It IS A FACT. NOW YOU CAN SUE ME."
- ii. "...I tried to warn those that try to harm our friends...If the dear Leshers get out of Jail on this deal,they will likely (sic) be rearrested for other crimes..."
- jj. "...I told you before it happened and I will tell you more as I can...Expect more charges to be filed on the Leshers...Obviously I can't give the info out before the law makes its move..."
- kk. "NOW the problem is,and has been that the LESHES and McCarver assaulted a woman against her WILL..."

- ll. “...So even if the three did not forceably HOLD her down and rape her,they did gold her mentally and intentionally,for illicit and wonton purposes...”
- mm. “leshers went to jail,leshers going back to jail,leshers stay in JAIL”
- nn. “...The drug dealing is on hold and has been for sometime...”
- oo. “...They [the Leshers] will be handcuffed and hauled off to PRISON.”
- pp. “...Mark and Rhonda Leshes ,along with Robert McCarver were charges with sexual assault. The offense took place at the Leshes compound(ranch)...”
- qq. “The Leshes were HANCUFFED and Hauled off to Jail like the common criminals they and Robert McCarver are...”
- rr. “RHONDA (Long) LESHER,MARK LESHER and ROBERT MCCARVER will be tried for SEXUAL ASSAULT and be found guilty by a Jury and the Jury will recommend the MAXIMUM punishment allowed...”
- ss. “The Leshes Trio of criminals should and will pay for their crime(s).”
- tt. “...If Mark Leshes is so PRISTINE in character and personal values,why is his name popping up in all these drug busts as a supplier and/or buyer????”
- uu. “It is the Leshes that have undenyably caused their own demise and committed this crime.”
- vv. “The Leshes did that they are accused of. GOD knows it...”
- ww. “...the Leshes trio will be found GUILTY in a COURT of LAW and will spend many years in prison
- xx. “...Yes, I did say we would destroy the Leshes and their corruption...it is our mission to HELP bring them and all associated with them ,IN CORRUPTION,down. They will be RUN out of town in a STATE PRISON bus...”
- yy. “Shame on The Leshes for SEXUALLY ASSAULTING a person in thier home.....or anywhere else,for that matter.”
- zz. “Rhonda is ,sort of a victim on association. Except for the Assault case. There she was a willing and active participant...”
- aaa. “If you think that Leshes has not been supplying drugs for some time ,,, you will be greatly surprised”
- bbb. “...The Leshes shall be punished for the Horrible attack on a helpless woman...”
- ccc. “Leshes spent monday and tuesday at the court house trying to intimidate Shady and Leona McCarver...But remember Leshes is BROKE ,so says Mrs. Herpies spreader.”
- ddd. “...Mark Leshes...has public threats against the victimand her family members...He has forged documents against jusge. He is being investigated for selling drigs. He has been named by drug users and sellers as being a drug dealer...He is being investigated for possible murder...He tried to cohearse a child into lying to the court...”
- eee. “...Mark Leshes...has public threats against the victimand her family members...He has forged documents against jusge. He is being investigated for selling drigs. He has been named by drug users and sellers as being a drug dealer...He is being investigated for possible murder...He tried to cohearse a child into lying to the court...”
- fff. “...Rhonda is the Queen of Herpes and spreading it through her Public contact business, not to mention her sex exploits...”
- ggg. “Have the Leshes ever denied their sex life? NO. Have they ever denied Rhonda has Genital Herpies? NO. Have they ever taken precautions to inform the Customers or their sex partners of the Herpies infection for which they are being exposed to? NO. Is this the RESPONCIBLE and caring actions of a reasonable citizen? NO. ...”

hhh. “Yo,bitty brains got any ehlp for GENITAL HERPES...Maybe abused rectum while in custody. How bout cure for 'PINKYITICE”

iii. “...If they can get enough of their sex partners( that haven't been exposed yet) there to get on Jury, they might have a slim chance”

jjj. “Rhonda's own words have hurt her credibility...Never has she denied the HERPIES Virus thing,Being bi-sexual,having sex parties or any of that stuff...”

kkk. “Rhonda's own words have hurt her credibility...Never has she denied the HERPIES Virus thing,Being bi-sexual,having sex parties or any of that stuff...”

lll. “Just go ask Rhonda or any of the girls that work there [Unique Touch] with her or Darlene Jones about the sexual exploits and the many women and men she and Mark share...The McCarvers are all KNOWN,most convicted,child molesters...Not being convicted does not make one innocent.”

mmm. “...the Bar is Leshers private little ahng out where only 'really important people can go to have orgies.”

nnn. “I...will stand by what I said and am ready to face any of your perverts...”

ooo. “...It is NO SECRET about the LESHES's strange and sordid sex practices...”

ppp. “...Everyone knows Rhonda like sex with either sex or both at the same time.... It is widely known and Even Rhonda herself will tell you so...”

qqq. “...just got the straw that will break the back of PINKY and ,slut Herpies, wife...but BEEELIEVE me when I say,IT's a HUM dinger...”

rrr. “Herpes and the prevention of it's spread is covered in the requirement of knowledge that a person HAS to know before receiving a LICENSE to work in Cosmetology field”

sss. “I wonder if Rhonda will disclose in the property sale documents that it has been exposed to S.T.D.s???”

ttt. “AND I am the one that posted that Rhonda had Genital Herpies,which she does...It is very common knowledge at U.T. That is why she keeps the VALTREX handy, It is also transmittable by skin touch. All this was posted for your info as a public service. That is why the Texas License Board is investigating her place and license...”

uuu. “Did we forget that old PINKY and his wife QUEEN OF HERPES got arrested for Rape. His ex common law wife died mysteriously. Her son died mysteriously. His Right hand Drugger, R.McCarver, got arrested too. Pinky is tied to Dr. Naples...”

vvv. “...Pinky and the Herpies Queen.”

www. “The judges I know would be Very upset to find thier court room has not been sanitized before they enter it ,after a Know carrier of communicable disease was present.”

xxx. “Well, I guess that would be one way to stop all but perverts from attending court..... STOP SANITIZING it...Herpies...”

yyy. “...The Queen of Herpies...”

zzz. “...Herpies Queen...”

aaaa. “...HERPIES>>>>INFESTED>>>>LESHER S>>>>...”

bbbb. “...And what would be DISCRIMINATING about sanitizing after a known disease carrier was infecting the area...”

cccc. “...Most of the people we have talked to that he [Mark Leshes] has represented said they for the raw end of the deal,, he promised to get them HUGE settlements but worked a settlement for far less than fair, just so he could get a pay day. Off their pain and suffering...”

dddd. "...The Above [link] is where anyone can file a complaint about and License holder, doing cosmetology work. Rhonda Leshers #COP-840066. If you have a legitimate report of violation of any information about unhealthy or dangerous situations"

eeee. "...It will come out that OL'CINCO is involved up to his 'PINKY'...They [Linda's stomach problems] started while with Mark and got worse. He is a Licensed Pharmacist.. Naples was treating people, with pesticides and wood treatment chemicals,for CANCER. The F.B.I., I understand, was and is working with Linda on information about the whole deal but ,she couldn't give up all the info without involving herself . They were trying to work out the deal to get her ammunity..."

ffff. "...He seems to be lacking in manhood...HE IS A RAT AND WILL ALWAYS BE A RAT"

gggg. "I wish I could have been a fly on the wall when PINKY got the call about the FUGITIVE WARRANT he had the OK lawyer trying to get for McCarver release...When the lawyer called and said NO WARRANT NEEDED...McCarver is not fighting extrdition. I'll bet you a dollar to a donut hole that Pinky pooped his pants"

hhhh. "When we( although I was not physically there I still use we) were watching the guy in the Blue Impala we noticed the Lic. number. Now I am not going to reveal the identity of the owner of the car...but it would be some what of interest to Mark to Know we know who it was a nd what they were actually doing. This will be of interest at another time , to some public OFFICIALS. I have posted this for the Leshers to see...And give them best regards ,from D.D. I'm sure they will understand...at least Pinkly will."

iiii. "...It looks like Pinky's scheme to get the I.R.S. On Mr Coyel is not doing so good. They seem to be more interested in Pinky than anyone else. His little man from La couldn't find anything to go to anyone with..."

jjjj. "Rhonda refers to Mark as pinky because he is not very well endowed..."

kkkk. "...Pinky told MIKE to go ahead with the cattle purchase they had talked about before this little setback came up..."

llll. "...Rhonda tells people, that come into her salon,about the ,LESS than adequate, size of her hubands penis and refers to it as PINKY..."

mmmm. "...The Leshers or at least Rhonda has stated in Public that the victim was not at the Compound (ranch) on that date...However in RECORDED court statements in another case, Rhonda and Robert McCarver,both,made statements to the contrary...who is going to get prosecuted for perjury?"

nenn. "McCarver is talking now---trying to make a deal."

oooo. "...I hear tha Red is already on the move and isready to talk..."

pppp. "...The authorities have been looking at and watching Lesher for some time...I have heard that Mark is trying to work a deal to place blame on others..."

qqqq. "GET ALL THE WOMEN AND CHILDREN OUT OF RRC"

rrrr. "...OL'CINCO will soon be doing the Chain gang shuffle and it's real hard to get pesticides in prison. But then againI guess he can get his assistant,MIKE RICE ,to visit you"

ssss. "It is a pattern the LESHERS follow, total disregard for the well being of those they come in contact with. They had no concern for the will and wish of a lady that was passed out,drugged ou or just asleep,whatever..."

tttt. "Excuse me—but it was MARK LESHES that tried to brow beat and intimidade a child into lying to a judge about some sex stuff about the childs step father...as stated in court testimony"

uuuu. "...We know the LESHERS are GUILTY. And their buddy Robert McCarver and ,thier other little buddy Mike RICE ,along with Rhonda Herself will help PROVE it to the WORLD...FACT..."

vvvv. "...It is a fact that Rhonda does roll in many directions and it was suggested that she too may be into CHILD molesting also..."

www. "NO he is more likely going to be mad,because he has to have the court room sanitized every time the Leshers walk in it."

xxxx. "Mark Leshar is one of the most reviled and distrusted lawyers in the State of Texas..."

yyyy. "...Ol' Pinky amn was at the court house today doing a little back street lawyering...He was overheard making a statement that 'before anyone can convict me of anything they have to get me in a court on trial first'... It was reported to me 3 hrs ago..."

zzzz. "...Rhonda...is telling all that will listen to her,anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her,because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHER...thier...several had witnesses the fight between her and Mark over ROBERT McCarver."

aaaa. "Last update from the crew...This past weekend ,at a let's feel sorry for Mark gathering at the famous BAR, OL' CINCO was getting a little tipsy...He went on to say' Shannon has no experience in court room affairs and I(mark) will have her so confused that when I get through the jury will believe she raped us...and then she will fill like she's been raped again.' This was info from the insider that was there...Rhonda said.. When all this took place it was with her (Shannons) O.K.,she didn't pass out until after we started having sex..."

bbbbb. "...That's when the Leshers decided to leave and had MIKE Rice and Robert have the Lady removed with the main house and taken to the TRAILER. Then told the guys not to let her leave..."

1165. The statements involved private matters.

1166. Alternatively, the statements involved public matters.

1167. The statement referred to plaintiff by name and/or indirectly.

1168. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1169. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1170. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1171. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1172. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1173. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1174. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1175. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1176. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1177. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1178. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1179. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1180. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1181. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1182. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1183. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1184. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1185. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1186. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1187. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles



plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 675-780- Defamation per se

1188. Defendant's written statement(s) described in Counts 569-674 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1189. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1190. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1191. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1192. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1193. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 781-886 - – Libel per se

1194. Defendant's written statement(s) described in Counts 569-674 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1195. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1196. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective

interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

1197. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Counts 887-888 – Defamation  
Interesting

1198. Defendant published a statement by written communication asserting as fact that,

a. “...If Lesher caught you Rhonda would 'TONGUE' your 'BUTT' while Lesher tried to 'SUCK' your Balls off! 'ROBERT MCCARVER' and Mike Rice would 'RAPE' you...”

b. “...Now ole Mc Lesher has 'KENNY' lying and in trouble. The Authorities are very suspicious...”

1199. The statement involved a private matter.

1200. Alternatively, the statement involved a public matter.

1201. The statement referred to plaintiff name.

1202. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1203. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1204. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1205. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1206. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1207. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1208. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1209. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).

More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 889-890- Defamation per se

1210. Defendant's written statement(s) described in Count 887-888 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1211. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 891-892– Libel per se

1212. Defendant's written statement(s) described in Count 887-888 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1213. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1214. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Count 893 – Defamation InTheSideLines

1215. Defendant published a statement by written communication asserting as fact that, "Or maybe, what Leshar has got in mind is a good ole, suicide in order for mcCarver. You know he knows how to rig that up..."

1216. The statement involved a private matter.
1217. Alternatively, it involved a public matter.
1218. The statement referred to plaintiff by name.
1219. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.
1220. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
1221. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
1222. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.
1223. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1224. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
1225. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
1226. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 894– Libel Per Se

1227. Defendant's written statement(s) described in Count 893 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured

Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1228. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 895 - Defamation per se

1229. Defendant's written statement(s) described in Count 893 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1230. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 896 – Defamation

##### Jail soon

1231. Defendant published a statement by written communication asserting as fact that, "TRIO OF TRASH' face 'LIFE SENTENCE'!...McCarver confessed to their guilt!..."

1232. The statement involved a private matter.

1233. Alternatively, it involved a public matter.

1234. The statement referred to plaintiff indirectly.

1235. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1236. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1237. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1238. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1239. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1240. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1241. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1242. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 897- Defamation per se

1243. Defendant's written statement(s) described in Count 896 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1244. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 898- Libel Per Se

1245. Defendant's written statement(s) described in Count 896 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1246. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 899-903 - Defamation

Joe

1247. Defendant published a statement by written communication asserting as fact that,

- a. “Facts is already stated: Perverts,Liars, Slime,Dope, Rape,Law Suits Liquor, Dump add all this up and you get 'Leshers' What can they say about the truth? Nothing”
- b. “Where would you have the bar and orgies at?...where would you get your dope...”
- c. “...I hope this perverted child molesting, women raping trash Leshers and McCarver try this with Jerry.”
- d. “...rhonda 'HERPIES' lesher mark 'VALTREX' lesher needs 'AIDS' test!!!!!!!!!!!!'GOES TO JAIL”
- e. “I think Rhonda and Mark Lesher bought some 'VALTREX' stock...Look on Rhondas mouth they buy enough to keep the stock up.”

1248. The statement involved a private matter.

1249. Alternatively, the statement involved a public matter.

1250. The statement referred to plaintiff by name.

1251. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1252. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1253. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1254. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1255. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1256. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1257. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1258. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1259. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1260. Additionally and/or alternatively, the statement was defamatory because it

unambiguously accused the Plaintiff of having a loathsome disease.

1261. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1262. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1263. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1264. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1265. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1266. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1267. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1268. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1269. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1270. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 904-908– Libel per se

1271. Defendant's written statement(s) described in Count 899-903 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured



Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1272. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1273. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 909-913- Defamation per se

1274. Defendant's written statement(s) described in Count 899-903 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1275. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1276. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1277. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1278. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1279. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 914-916-Defamation

##### Joe 6-Pack

1280. Defendant published a statement by written communication asserting as fact that,

a. "...Rhonda Leshler 'THREATENS' Rotary Club! Rhonda [McCarver Long]Leshler tells Rotary club members, Me 'ROBERT MCCARVER', and Mark wants to teach a class on how to 'DRUG' and 'RAPE' a 'VICTOM' 'DRUGS' 'RAPE' 'CHILD MOLESTING' 'ORAL SEX' 'ORGIES' 'HERPIES' and 'DYNAMITE' we have vast 'EXPERIENCE' on!..."

b. "...Mark[QUEER}Leshler!"

c. "Could be the 'SHIT EATING SLUT' gut her 'BUTT TONGUE' hung in 'ROBERT MCCARVERS' ass! Them Leshler give her some 'DOPE'" and Leshler took 'DOPE' and their all 'DOPEY'!..."

1281. The statement involved a private matter.

1282. Alternatively, the statement involved a public matter.
1283. The statement referred to plaintiff by name and/or indirectly.
1284. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
1285. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
1286. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
1287. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
1288. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
1289. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
1290. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
1291. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
1292. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1293. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
1294. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
1295. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the

issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 917-919- Defamation per se

1296. Defendant's written statement(s) described in Count 914-916 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1297. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1298. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1299. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 920-922– Libel Per Se

1300. Defendant's written statement(s) described in Count 914-916 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1301. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 923 – Defamation

John

1302. Defendant published a statement by written communication asserting as fact that, "Since we are giving fictitious awards out, how about best 'date rape drug mixer' or 'sexual deviant of the year' No, wait I've got it, for Rhondas performance with the Clarksville news. 'Most ignorant defendant' goes to .... You get the point."

1303. The statement involved a private matter.

1304. Alternatively, the statement involved a public matter.

1305. The statement referred to plaintiff by name.

1306. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1307. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1308. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1309. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1310. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1311. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1312. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1313. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1314. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1315. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1316. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1317. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 924– Libel Per Se

1318. Defendant’s written statement(s) described in Count 923 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1319. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 925 - Defamation per se

1320. Defendant’s written statement(s) described in Count 923 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1321. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1322. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1323. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 926 – Defamation  
Joice

1324. Defendant published a statement by written communication asserting as fact that, “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...””

1325. The statement involved a private matter.

1326. Alternatively, the statement involved a public matter.

1327. The statement referred to plaintiff by name.

1328. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1329. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by innuendo.

1330. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1331. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1332. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1333. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1334. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1335. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1336. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1337. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1338. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1339. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 927- Defamation per se

1340. Defendant's written statement(s) described in Count 926 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1341. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1342. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1343. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 928 – Libel Per Se

1344. Defendant's written statement(s) described in Count 926 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1345. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 929 – Defamation Just a GODLY person

1346. Defendant published a statement by written communication asserting as fact that, "The leshers ruined their lives themselves by committing the crime they will be found guilty of, in a court of law."

1347. The statement involved a private matter.

1348. Alternatively, it involved a public matter.

1349. The statement referred to plaintiff by name.

1350. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1351. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1352. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1353. The statement was false because Plaintiffs did not commit the crime that they were

accused of committing.

1354. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1355. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1356. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1357. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 930– Libel Per Se

1358. Defendant's written statement(s) described in Count 929 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1359. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 931- Defamation per se

1360. Defendant's written statement(s) described in Count 929 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1361. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.



Count 930 – Defamation  
just curious

1362. "I think we hav heard enough about herpies. We have been told Rhonda has it. She hasn't denied it. Her customers know it, and can decide what they want to do. I feel for anyone who has any desiese that cannot be cured..."

1363. Defendant published a statement by written communication asserting as fact that,

1364. The statement involved a private matter.

1365. Alternatively, the statement involved a public matter.

1366. The statement referred to plaintiff by name.

1367. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1368. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1369. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1370. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1371. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

1372. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

1373. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1374. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1375. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1376. Defendant's false statement caused injury to plaintiff, which resulted in the following damages: Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1377. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1378. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

1379.

#### Count 931– Libel Per Se

1380. Defendant's written statement(s) described in Count 930 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1381. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 932 - Defamation per se

1382. Defendant's written statement(s) described in Count 930 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1383. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1384. These types of allegations makes a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1385. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 933-934 – Defamation  
Justice

1386. Defendant published a statement by written communication asserting as fact that,

a. “If you or you know anyone that has been infected with 'AIDS' , 'HERPIES' By Rhonda[Long]Leshler, Robert McCarver or Mark Leshler please call your local health department...”

b. “...Now when real slime, perverted pieces of shit Robert McCarver, Rhonda[Long] Leshler and Mark Leshler that we all know are scumb, you lesher 'LOSERS' hollar!...”

1387. The statement involved a private matter.

1388. Alternatively, the statement involved a public matter.

1389. The statement referred to plaintiff by name.

1390. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1391. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1392. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1393. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1394. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1395. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1396. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1397. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1398. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1399. Defendant’s false statement caused injury to plaintiff, including substantial damage to

Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1400. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1401. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 935-936– Libel Per Se

1402. Defendant's written statement(s) described in Count 933-934 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1403. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 937-938- Defamation per se

1404. Defendant's written statement(s) described in Count 933-934 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1405. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct.

1406. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1407. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 939 – Defamation  
Justice is coming

1408. Defendant published a statement by written communication asserting as fact that, “...Rice tried to turn Lindas electricity off and Linda shot at him...Linda was in trouble over Leshers 'DRUGS' she was getting from the hospital for him. Lesher let Linda take the wrap, then kicked her out!...”

1409. The statement involved a private matter.

1410. Alternatively, it involved a public matter.

1411. The statement referred to plaintiff by name.

1412. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1413. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1414. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1415. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1416. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1417. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

1418. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1419. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 940- Defamation per se

1420. Defendant's written statement(s) described in Count 939 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1421. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 941 – Libel Per Se

1422. Defendant's written statement(s) described in Count 939 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1423. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 942-944 – Defamation justice will prevail

1424. Defendant published a statement by written communication asserting as fact that,

- a. "Well he should be the next to go to jail. I mean hell isn't he the one who escorted and hand delivered Shannon to the Leshers for their sick plan?..."
- b. "I truly believe that Ms. Herpies is enjoying this attention so much that she WONT keep her mouth shut, she is to stupid to know how it really makes her look, she seems to think that is making her look important, a celebrity statis? She is a big joke in my opinion..."
- c. "And you shouldn't use the words, honesty, integrity and morals in the same sentence as the Leshers, cause everybody knows they are none of those things."

1425. The statement involved a private matter.

1426. Alternatively, the statement involved a public matter.

1427. The statement referred to plaintiff by name and/or indirectly.
1428. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
1429. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
1430. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
1431. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
1432. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
1433. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
1434. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
1435. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
1436. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
1437. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
1438. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
1439. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
1440. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1441. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.
1442. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1443. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 945-947– Libel per se

1444. Defendant's written statement(s) described in Count 942-944 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1445. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1446. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 948-950- Defamation per se

1447. Defendant's written statement(s) described in Count 942-944 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1448. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1449. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1450. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.



1451. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 951-954 – Defamation

KaRma

1452. Defendant published a statement by written communication asserting as fact that,

a. “They have a Time Disease! 'AIDS' and 'HERPIES' who knows what else all mixed together, 'LETHAL' Call 'ORKIN' 'BUGGS!'”

b. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshner! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!...”

c. “...McCarver planted 'DOPE' on Jerry's land twice and Jerry told him not to... You with Mark Leshner's help slipped his wife 'DRUGS' trying to get to Jerry's Money...”

d. “... 'QUEER' like Mark Leshner... Mark Leshner the 'ANTICHRIST' has had the F.B.I. After him but just could not get a break... 'DISEASE INFESTED SCUM'! They have a Time Disease! 'AIDS' and 'HERPIES' who knows what else all mixed together, 'LETHAL' Call 'ORKIN' 'BUGGS!'”

1453. The statement involved a private matter.

1454. Alternatively, the statement involved a public matter.

1455. The statement referred to plaintiff by name and/or indirectly.

1456. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1457. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1458. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1459. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1460. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1461. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1462. Additionally and/or alternatively, the statement was defamatory because it

unambiguously accused the Plaintiffs of having a loathsome disease.

1463. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1464. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1465. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1466. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

1467. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1468. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1469. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1470. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1471. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 955-958- Defamation per se

1472. Defendant's written statement(s) described in Count 951-954 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1473. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1474. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1475. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1476. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 959-962 – Libel Per Se

1477. Defendant's written statement(s) described in Count 951-954 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1478. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 963-964 – Defamation

Kevin

1479. Defendant published a statement by written communication asserting as fact that,

a. "...Leshers and McCarver will be convicted..."

b. "...If you were ever in the U.T., you have had to have heard about their [N.B. *the Leshers*] vile sex acts.If you knew Mark, he has given, or tried to give you Viagra. These people are despicable."

1480. The statement involved a private matter.

1481. Alternatively, the statement involved a public matter.

1482. The statement referred to plaintiff by name and/or indirectly.

1483. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1484. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1485. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by implication.

1486. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1487. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1488. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1489. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1490. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1491. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1492. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1493. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1494. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 965-966– Libel Per Se

1495. Defendant's written statement(s) described in Count 963-964 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1496. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 967-968- Defamation per se

1497. Defendant's written statement(s) described in Count 963-964 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1498. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1499. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1500. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 969-971 - Defamation

Knight Rider

1501. Defendant published a statement by written communication asserting as fact that,

a. "After getting 'INFESTED' with 'DISEASES'! From Rhonda[McCarver]Leshner and Mark Leshner.

b. "Facts are coming out about Leshner and his 'SLUT' wife Rhonda. 'ROBERT MCCARVER' is infected also as reported!"

c. "After further investigation Rhonda[McCarver]Leshner and Mark Leshner ha given several Africam Men 'HERPIES' and 'AIDS'!... They want money out of Leshner for infecting them with 'DISEASES'!..."

1502. The statement involved a private matter.

1503. Alternatively, the statement involved a public matter.

1504. The statement referred to plaintiff by name and/or indirectly.

1505. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1506. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1507. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiff of having a loathsome disease by innuendo.

1508. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1509. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1510. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1511. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1512. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1513. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1514. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1515. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1516. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 972-974- Defamation per se

1517. Defendant's written statement(s) described in Count 969-971 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1518. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct.

1519. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1520. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 975-977– Libel Per Se

1521. Defendant’s written statement(s) described in Count 969-971 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1522. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 972 – Defamation

Lacy

1523. Defendant published a statement by written communication asserting as fact that, “...Also heard Mark is supplying Robert and Tommy Sue with more of his drugs...”

1524. The statement involved a private matter.

1525. Alternatively, it involved a public matter.

1526. The statement referred to plaintiff by name.

1527. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1528. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1529. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1530. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1531. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1532. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1533. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1534. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 973– Libel Per Se

1535. Defendant's written statement(s) described in Count 972 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1536. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 974 - Defamation per se

1537. Defendant's written statement(s) described in Count 972 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1538. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.



Counts 975-976 – Defamation

laura

1539. Defendant published a statement by written communication asserting as fact that,

a. “call me lou or who you want...this trio is guilty as sin their past and present history tells that.”

b. “...this trio is guilty...”

1540. The statement involved a private matter.

1541. Alternatively, it involved a public matter.

1542. The statement referred to plaintiff indirectly.

1543. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1544. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1545. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1546. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1547. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1548. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.

1549. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1550. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 977-978- Defamation per se

1551. Defendant's written statement(s) described in Count 975-976 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1552. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 979-980– Libel Per Se

1553. Defendant's written statement(s) described in Count 975-976 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1554. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 981- 983 - Defamation

##### Leshner Scum

1555. Defendant published a statement by written communication asserting as fact that,

- a. "...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!..."
- b. "Leshners History...[4] 'DRUGS' Makes illegal 'DRUGS', grows illegal 'DRUGS'! Sells illegal 'DRUGS'!...[6] 'RAPE' Drugged and 'RAPED' a woman! [7] Tried to get D.J. Coyel to lie to a Judge...Rhonda Leshner has lied under oath..."
- c. "If you or you know anyone that has been infected with 'AIDS' , 'HERPIES' By Rhonda[Long]Leshner, Robert McCarver or Mark Leshner please call you r local health department..."

1556. The statement involved a private matter.

1557. Alternatively, the statement involved a public matter.

1558. The statement referred to plaintiff by name and/or indirectly.

1559. The statement was defamatory because it unambiguously accused the Plaintiff of sexual

misconduct.

1560. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1561. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1562. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1563. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1564. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1565. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

1566. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1567. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1568. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1569. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

1570. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1571. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1572. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1573. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1574. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).

More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 984-986 – Libel per se

1575. Defendant’s written statement(s) described in Count 981-983 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1576. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

1577. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 987-989- Defamation per se

1578. Defendant’s written statement(s) described in Count 981-983 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1579. Further, Defendant’s written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1580. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1581. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1582. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 984-989 – Defamation

##### Lie Breaker

1583. Defendant published a statement by written communication asserting as fact that,

a. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhar Mark Leshner and 'ROBERT MCARVER' raped her!...”

b. “...Rhonda...is telling all that will listen to her,anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her,because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHNER...Rhonda Leshner now has insulted the Grand Jury...Rhonda must think its 'GREAT' to 'TONGUE' and have 'SEX' with Black people like Stacy Coleman, just not her Juriors!”

c. “...Sometimes they go into a known Drug Dealers house, Like Mark Leshner...”

d. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

e. “The 'SLUT' won't answer She knows we know all about the 'DISEASE INFESTED ORGIE BAR!’”

f. “...How many Pricks and 'BUTTS' have you and Rhonda[McCarver]Leshner 'SUCKED' and 'TONGUED'? Who runs the 'VIBRATORS' used on Mark Leshner and 'ROBERT MCCARVER' you or Rhonda or Both! And how often do you brush your Teeth?”

1584. The statement involved a private matter.

1585. Alternatively, the statement involved a public matter.

1586. The statement referred to plaintiff by name and/or indirectly.

1587. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1588. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1589. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1590. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1591. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1592. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1593. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

1594. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1595. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1596. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1597. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

1598. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1599. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1600. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1601. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1602. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 990-995- Defamation per se

1603. Defendant's written statement(s) described in Count 984-989 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1604. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1605. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1606. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1607. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 996-1001– Libel Per Se

1608. Defendant's written statement(s) described in Count 984-989 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1609. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1002-1004-Defamation lie buster

1610. Defendant published a statement by written communication asserting as fact that,

a. "...'QUEER' like Mark Leshner... Mark Leshner the 'ANTICHRIST' has had the F.B.I. After him but just could not get a break... 'DISEASE INFESTED SCUM'!..."

b. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshner! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

c. "...Mark Leshner several years ago gave Jerry some HGH and outhere highly regulated Drugs. Jerry kept these Drugs, Leshner was trying to get Jerry to buy these from him at a discount! 'WITHOUT A PRESCRIPTION'!! And most likely stolen..."

1611. Defendant published a statement by written communication asserting as fact that,

1612. The statement involved a private matter.

1613. Alternatively, the statement involved a public matter.

1614. The statement referred to plaintiff name.

1615. The statement was defamatory because it unambiguously accused the Plaintiff of sexual

misconduct.

1616. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1617. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1618. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1619. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1620. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1621. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

1622. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1623. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1624. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1625. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

1626. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1627. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1628. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1629. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1630. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).



More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1005-1007– Libel per se

1631. Defendant’s written statement(s) described in Count 1002-1004 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1632. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

1633. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1008-1010- Defamation per se

1634. Defendant’s written statement(s) described in Count 1002-1004 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1635. Further, Defendant’s written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1636. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1637. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1638. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1011- Defamation  
Life

1639. Defendant published a statement by written communication asserting as fact that, “Robert McCarver has 'CONFESSED' to D.A. Val Varley and Sheriff Terry Reed about Mark Leshers 'DRUG DEALS', 'RAPE' and outhur 'CRIMES'!...”

1640. The statement involved a private matter.

1641. Alternatively, the statement involved a public matter.

1642. The statement referred to plaintiff by name.

1643. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1644. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1645. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1646. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1647. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1648. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1649. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

1650. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1651. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1652. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshers’ law practice, substantial damage to Rhonda Leshers’ beauty salon, embarrassment, and ostracization within the community.

1653. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1654. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1012- Defamation per se

1655. Defendant's written statement(s) described in Count 1011 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1656. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1657. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1658. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1013-- Libel Per Se

1659. Defendant's written statement(s) described in Count 1011 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1660. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1014 – Defamation Life of criminals

1661. Defendant published a statement by written communication asserting as fact that, “TRIO OF TRASH' face 'LIFE SENTENCE'!...McCarver confessed to their guilt!...”

1662. The statement involved a private matter.

1663. Alternatively, it involved a public matter.

1664. The statement referred to plaintiff indirectly.

1665. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1666. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1667. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1668. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1669. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1670. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

1671. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1672. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 1015– Libel Per Se

1673. Defendant's written statement(s) described in Count 1014 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1674. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1016- Defamation per se

1675. Defendant's written statement(s) described in Count 1014 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1676. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1017

##### Illoouu

1677. Defendant published a statement by written communication asserting as fact that, "...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhner Mark Leshner and 'ROBERT MCARVER' raped her!..."

1678. The statement involved a private matter.

1679. Alternatively, the statement involved a public matter.

1680. The statement referred to plaintiff by name.

1681. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1682. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1683. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1684. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1685. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1686. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1687. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1688. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1689. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1690. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1691. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1692. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1018- Defamation per se

1693. Defendant's written statement(s) described in Count 1017 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1694. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1695. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1696. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1019– Libel Per Se

1697. Defendant’s written statement(s) described in Count 1017 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1698. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1020-1027

##### Ilou

1699. Defendant published a statement by written communication asserting as fact that,

- a. “...I done told you she don't mess with 'PERVERTS' or 'HERPIES' 'AIDS' infested 'SCUM' like you or this 'TRIO OF TRASH!'”
- b. “...and they want to 'SUCK' your Balls off! Rhondas 'BUTT TONGUE' is hard!...”
- c. “...They are going to get Rhonda[McCarver]Leshner and her 'BUTT TONGUE'!... and their going to 'SUCK' your Balls off!...”
- d. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”
- e. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!”
- f. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”
- g. “How many 'BUTTS' do you 'TOUNGUE' in a day?”
- h. “...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!...”

1700. The statement involved a private matter.

1701. Alternatively, the statement involved a public matter.

1702. The statement referred to plaintiff by name and/or indirectly.

1703. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1704. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1705. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1706. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1707. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1708. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1709. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1710. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1711. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1712. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1713. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1714. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1715. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1716. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1717. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1718. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.



1719. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1720. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1721. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1722. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1028-1035– Libel per se

1723. Defendant's written statement(s) described in Count 1020-1027 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1724. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1725. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1036-1043- Defamation per se

1726. Defendant's written statement(s) described in Count 1020-1027 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1727. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1728. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1729. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1730. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1044 – Defamation  
loloou

1731. Defendant published a statement by written communication asserting as fact that, "...Ricky Long, RhondaLongLeshers Brother? Caught with a load of Mark Leshers 'DRUGS'!...How many more lives will this 'TRIO OF TRASH' ruin?"

1732. The statement involved a private matter.

1733. Alternatively, it involved a public matter.

1734. The statement referred to plaintiff by name.

1735. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1736. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1737. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1738. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1739. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1740. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1741. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1742. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles

plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1045– Libel Per Se

1743. Defendant’s written statement(s) described in Count 1044 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1744. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1046 - Defamation per se

1745. Defendant’s written statement(s) described in Count 1044 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1746. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1047-1053 – Defamation

1000

1747. Defendant published a statement by written communication asserting as fact that,

a. “I just can't help thinking, wonder how many 'BUTTS' that Tongue of Rhondas has been in?... Don't you know the 'HERPIES' and 'SHIT' is flying...”

- b. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!...”
- c. “I cain't get over Rhonda[McCarver,Long]Leshers 'RIM JOB TONGUE'! No wonder Shannon said she could feel 'RHONDA' 'SUCKING' and 'BITING' her Vagina! This was testified to in court! After 'RHONDA' got through 'SUCKING' Shannon guts out she barley felt the 'PERVERTED' 'QUEERS' 'PINKIES'! I be 'RHONDA' even stuck that 'TONGUE' up her butt and sucked! 'WEIRD APITITE', 'SHIT EATER!' 'YUCK!'”
- d. “...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!...”
- e. “Rhondas 'BUTT' tongue!”
- f. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!...”
- g. “Rhonda[McCarver,long]Leshler and Sharla[wrinkled] Woods are at Leshers compound with 'ROBERT MCCARVER' bumping 'CUNTTS'!”

1748. The statement involved a private matter.

1749. Alternatively, the statement involved a public matter.

1750. The statement referred to plaintiff by name and/or indirectly.

1751. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1752. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1753. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1754. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1755. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1756. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1757. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

1758. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of committing a crime by innuendo.

1759. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1760. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

1761. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

1762. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

1763. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

1764. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

1765. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

1766. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1767. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1768. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1769. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1770. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 1054-1060- Defamation per se

1771. Defendant's written statement(s) described in Count 1047-1053 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1772. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1773. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1774. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1775. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 1061-1067- Libel per se

1776. Defendant's written statement(s) described in Count 1047-1053 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1777. Further, Defendant's written statement(s) described in Count 1047-1053 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1778. Further, Defendant's written statement(s) described in Count 1047-1053 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

1779. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Count 1068 - Defamation  
los goat

1780. Defendant published a statement by written communication asserting as fact that, "...LESHER< MCCARVER' slime...They are all 'PERVERTS', 'CHILD MOLESTERS', 'CRIMINALS' and 'LOOSERS'...'PERVISION'"
1781. The statement involved a private matter.
1782. Alternatively, the statement involved a public matter.
1783. The statement referred to plaintiff name.
1784. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
1785. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
1786. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
1787. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
1788. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
1789. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
1790. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
1791. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
1792. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1793. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.
1794. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
1795. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs

incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1069- Defamation per se

1796. Defendant's written statement(s) described in Count 1068 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1797. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1798. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1799. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1070– Libel Per Se

1800. Defendant's written statement(s) described in Count 1068 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1801. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1071-1074 - Defamation Losers Look

1802. Defendant published a statement by written communication asserting as fact that,

- a. "...The rest of you Leshers, 'ROBERT MCCARVER' Perverts can 'KISS' my 'ASS'! Except Rhonda, Don't want that 'SKANKS' 'TONGUE' around me!"
- b. "...Guess her [*n.b. Sharla Woods*] and Rhonda are 'MUFF DIVING] or got Rhondas 'TONGUE' hung in her 'BUTT'!!..."
- c. "Leshers'LOVER' 'ROBERT MCCARVER'!"



- d. “Look at the Post of 'RHONDAS BUTT TONGUE' She is a nasty 'SLUT!'”
1803. The statement involved a private matter.
1804. Alternatively, the statement involved a public matter.
1805. The statement referred to plaintiff by name and/or indirectly.
1806. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
1807. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
1808. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
1809. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
1810. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
1811. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.
1812. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
1813. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 1075-1078- – Libel Per Se

1814. Defendant’s written statement(s) described in Count 1071-1074 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s)

injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1815. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1079-1082- Defamation per se

1816. Defendant's written statement(s) described in Count 1071-1074 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1817. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1083-1325 – Defamation

lou

1818. Defendant published a statement by written communication asserting as fact that,

a. "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

b. "...The Leshners are known to have sex with animals, deal drugs, orgies, rape, perversion, and spread Herpies..."

c. "...Ricky Long, RhondaLongLeshners Brother? Caught with a load of Mark Leshners 'DRUGS!'..."

d. "...Rhonda...is telling all that will listen to her, anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her, because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people, for I am not black and because they all do not like white people with money,' quote by RHONDA LESHNER...thier...several had witnesses the fight between her and Mark over ROBERT McCarver...Rhonda Leshner now has insulted the Grand Jury..."

e. "How much money will it cost tax payers to clean up this 'DISEASE' infested place [*n.b. the Unique Touch*] when they shut it down?"

f. "...Jail...Who has the history of child molesting, orgies, herpies, drugs, frivolous law suits, paying for strippers to have oral sex with, alcoholic, criminal pervert living with them with court dockments to prove it, charged with rape...Jail...Rhonda Leshner, Robert Lynn McCarver, Mark Leshner...Robert did work for Jerry over two years ago until Mark Leshner Got him hooked on drugs and made him his fall guy drug dealer to sell to people like Ray price and local dope heads...moreless..."

- g. “Silver Bullet is right, the topic is how long will this 'HERPIES' infested, 'PERVERTED', 'LESBIAN', 'HOMOSEXUAL', 'SLIME' get in Jail? Its not if but how long Mark Leshar, Robert McCarver and Rhonda Leshar will go to Jail for? I personally hope this trash gets life.”
- h. “This scumb is returning from Sturgess, 'ORGIES' 'DRUGS' 'RAPE' is their game! Get the 'CLOROX' out.”
- i. Reposted lou's post-- “Everybody better go stock uo on 'CLOROX' bleach there ain't no telling what disease this perverted drug headed scumb will bring back from their orgies!!!...Wonder who they drugged at Sturgis?”
- j. “...If this destroys this 'HERPIES' infested scumb that's good...McCarver was living with the Leshers getting 'VIAGRA' from Leshar to screw Rhonda as Mark Leshar watched. Then Mark Leshar sucked the jisim out! This is McCarvers testimony, 'FACTS' and he told a lot more!!!!'YUCK' sick perverts will go to Jail!!!!!!!!!!!!”
- k. “...you could not help 'RAPING' her after Rhonda performed 'ORAL SEX' on her. You had to give her dope and try to get Jerrys money...'HERPIES'...pervision...”
- l. “...They took Shannon to their ranch and drugged her while Rhonda gave oral sex and sucked and bit her vigina Leshar and McCarver watched then raped her...orgie bar, Herpies...”
- m. “...I only wish we could hang this perverted trash. I would love to watch them swing, choke and shit their pants. You have forgot about the victom, a hepless woman and an 11 year old boy. If we could hang this trash in public there would ve a stop to these child molesting woman raping 'HERPIES' infested perverted scum!!!!!!!!!!!!”
- n. “Everybody better go stock uo on 'CLOROX' bleach there ain't no telling what disease this perverted drug headed scumb will bring back from their orgies!!!...Wonder who they drugged at Sturgis?”
- o. “When Shannons son D.J. Was testifying about Mark Leshar, Leshar came in and tried to intimidate D.J. But the Judge saw this and made Leshar leave the Court room. Folks I believe the ice just broke under these perverts feet!”
- p. “Havent we had enough of this? 'PERVISION' 'DRUGS' FRIVOLOUS LAWSUITS?”
- q. “Any time a grown man Lawyer like Mark Leshar sits and 11 year old boy down and tells D.J. To say he seen his father have sex with his sister and makes him play with himself while the father watches is 'MOLESTATION' 'PERVISION' 'MORLESS' and the bastard should be exterminated! Look at the Leshers history he is sick and I believe he should rot in 'HELL'!!!!!!!!!!!! You call it what you want you sick pervert.”
- r. “How would anyone like to be drugged after trusting someone while you were out of it had Rhonda Leshar suck and bite your vigina while performing oral sex on then Mark Leshar and Robert McCarver laugh while you were parilized but awake then rape you...victoms...I hope this happens to you...'PERVISION' 'GREED' This trash molested the wrong mans family because this is just the beginning...the 'FACTS' keep getting in the way.”
- s. “...Drugs, pervision,trashing the heroes that have passed...Orgies,strippers,liers, ki ck back of tax payers money on main street project. Trying to get an 11 year old boy to lie for his greed and pervision...”
- t. “...so the pervert can molest the victom while drugged, knocked out, asleep, unconcience, dazed..”
- u. “...This Rhonda, Mark Leshar, Robert MCCarver trio of criminal perverts with a history of pervision, drugs, frivolous lawsuits, oral sex, fall guys, orgies, have molested and raped the wrong mans family...”

- v. “We have a vendetta against all child molesters, drugg dealers, woman rapist slimy trash like The Leshers and McCarvers! These perverts ill go to Jail!...”
- w. “Rhonda you and Leshes are the ones that probably molested her, I know for a fact she is talking to cps and Sheriff office about you perverts right now...I hope she tells enough for G.J. To indite you all...so get ready perverts there is more coming!”
- x. “...just 'FACTS' from the crime they comitted, 'DRUGS', 'RAPE', 'PERVISION',!!!!!!!Mo re charges to come!!!!!!!#”
- y. “Perverted child molesting, women raping trash!!!!”
- z. “The childs name was 'SHADY MCCARVER' and her mother is 'LEONA MCCARVER'...Shady is currently talking to the authorities about Mark and Rhonda Leshes...Shady ain't through with the perverts yet!”
- aa. “### 'ilbediped' notice leshes perverts don't deny raping Shannon but try to lie about D.J.. What would you call what Leshes did to D.J. If not molest...”
- bb. “...Mark Leshes thinks they will skate through this rape trial...What this perverted trash don't know is their Jail cells are already ready for them. 'YOU CAN BANK ON THAT'!!!!!!!!!!!!”
- cc. “You have not noticed anyone that sells drugs for Mark Leshes commits suicide, dies in the bath tub or from playing with an unloaded gun. I hope you are next 'PERVERT'.”
- dd. “...Mike Rice was to Keep the victom, Shannon Coyel along with Robert McCarver from leaving Mark Leshes ranch and keep her on drugs so Leshes could have his Lawyer friend sue Jerry and try and get money. Rhonda performed oral sex in the victom then Mark and Robert raped her as she was awaking from the drugs they gave her. Shannon got scared even the drugs they gave her couldn't keep her there!!!”
- ee. “...'MARK LESHER' you are there tell your facts you lying perverted woman and child molester!...”
- ff. “...I don't want honey or vinegar I won't their 'BLOOD'!!!...victom...Yall don't know the facts and I can't tell you, when you do you will want their 'BLOOD' to...DJ the one Mark Leshes mind molested is my favorite and I will never forget that. D.J. 11 years old molested by a 62 year old pervert Mark Leshes.”
- gg. “...Mark Leshes, Rhonda Leshes and Mike Rice were ran out of Clarksville High School according to 'BUDWEISER' last knight trying to molest kids!...”
- hh. “...Leshes and McCarver druggen Shannon and while Rhonda Leshes was performing oral sex on Shannon she woke up...”
- ii. “Just this week Shady McCarver put another pervert away for 20 years on hearsar, no dna just the truth...These perverts will go to Jail!”
- jj. “You spineless bastards get on you computer and tell your lies and garbage because cowards and perverts hide and lie. Why not have the backbone and tell of your orgies, pervision and how really sick you are...I guess Rhonda Leshes sucking, biting while performing oral sex on a drugged victom is normal...”
- kk. “If you leshes supporters know the facts avout Shannon being drugged and raped tell it! You won't because you know Robert McCarver, Rhonda Leshes, and Mark Leshes are 'GUILTY' perverted filth...Why did Leshes, McCarver and Rice hold and hide Shannon for two weeks? Why did Leshes not call Jerry Coyel they knew him well and mooched off him for years.”
- ll. “...This perverted trash raped and molested the wrong mans family.”
- mm. “Amy White was working at the hospital in Clarksville for years until McCaver got her hooked on drugs furnished by Mark Leshes then she went down because of pervision and greed of Mark Leshes...”

nn. “...My name is Lou White...This perverted morless trash will all go to Jail.”

oo. “...This trio of perverts will go to Jail...There is a lot more to come!!!!!!!!!!!!”

pp. “...It is not us that have two indictments, we did not molest the victom or the 11 year old boy you like them must be a sick 'PERVERT'. Your type of scumb would love to keep molesters a secret, we don't!!!!!!!!!!!!”

qq. “...this perverted moroless 'RAPING' 'CHILD MOLESTING, 'PERVERTED' scumb will go to Jail no matter what it takes!!!!!!!!!!!! This scumb better worry because I know for a fact Jerry Coyel won't let up...Do it Lesher, you chicken shit...”

rr. “Talk with Lucy Lallar, David Bernett, Alan Hale, Tommy Welch, James Welch, and intelligent person about this Lehser McCarver Perverted Child Molesting 'SCUMB'!!!!!!!!!!!!”

ss. “This is easy to figure out Rhonda[Long}Lesher, Robert McCarver and Mark Lesher are all guilty as charged...they are all perverts! 'GUILT' is all over this!”

tt. “...You don't know the Victom but you bash her!!! You are thinking where would I get my DOPE from, or who would I have 'ORGIES' with if the Leshers go to Jail!”

uu. “...Perverted scumb will go to 'JAIL'!!!!!!!!!!!!”

vv. “...Jail...victom...Why did this 'HERPIES' infested 'SLUT' Rhonda Lesher Lie. This trash will go to Jail!!!!”

ww. “I would love to forgive you and that slut you call Rhonda your wife right after you were both hung. I wish this was and should be a capitol offence!!!!!!!!!!!!”

xx. “...This perverted 'HERPIES' disease infested scumb will go to Jail!!!!!!”

yy. “You should control your buddy the Leshers from spreading 'HERPIES' and Rhondas appite for sucking the guts out of drugged victoms!...”

zz. “...Ricky Long Rhonda [Longs] brother charged with Mark Leshers dope...'HERPIES' has affected your brain!!!!!!!!!!!!”

aaa. “...Two different Grang Juries indicted this scumb after hearing evidence from several people. Mark Lesher tried to get an 11 year old boy to say he saw his step father have sex with his sister and had the boy play with hiself while the father watched. This was testified to in court by D.J. Coyel.Lesher hand wrote and typed a letter saying Judge Jim Lovett had sex with Jerrys ex wife and was a moroless Judge...This piece of shit Lesher will go to Jail and be disbared...”

bbb. “...Two different Grang Juries indicted this scumb after hearing evidence from several people. Mark Lesher tried to get an 11 year old boy to say he saw his step father have sex with his sister and had the boy play with hiself while the father watched. This was testified to in court by D.J. Coyel.Lesher hand wrote and typed a letter saying Judge Jim Lovett had sex with Jerrys ex wife and was a moroless Judge...This piece of shit Lesher will go to Jail and be disbared...”

ccc. “...outhers...Bar above U.T. [Unique Touch] is where one said it [cocaine] was bought from...”

ddd. “...This criminal trio Will go to Jail again because more charges will come, this I know for a fact. They will go to Jail!!!!!!...OLe Pinky, Lesher is in for a big suprise!!!!!!!!!!!!”

eee. “...the prenut just shows how Stupid the Pinky boy [Mark Lesher] was for trying his hand at Extortion. Remember, the husband [Jerry Coyel] made an offer to settle divorce. Pinky just got too greedy...”

fff. “...dockments...Leshers and McCarvers and both have commited perjury.”

ggg. “...They molest their own children and butt F--- each outhar at the Uk bar. All people I have spoke with say Mark, Rhonda Lesher and McCarver should be excuted, shot in their slimy heads. When this scumb go to prison they will get what they deserve, maybe before...This trash fooled with the wrong mans family...”

hhh. "...Leshes was at court trying to intimidate Shady..."

iii. "Just wait until the trial, I know for a fact D.A. Val Varley has been overloaded with facts concerning this trio of trash."

jjj. "The 'EVIDENCE' will prove them guilty, not my opinion. I wish I could tell you all 'FACTS' not hearsay, or gossip but proof and confession, and testimony that the D.A. has...There is more than what this scumb did to Shannon and 11 year old D.J. Coyel..."

kkk. "...This Leshes, McCarver Perverted Scumb will go to Jail!!!!!!!"

lll. "You ain't seen nothing yet, when this trio of trash gets convicted we will file civil law suits on the Leshes and proceeds will go to RRCounty after we win our civil suit!...victim!!!!!!!!!!!"

mmm. "Hey Mark, Jerry takes a bath in the evening, then he cleans his guns, this might be your chance. I bet Jerry will be easier than Linda Velvin and her kin. You go to Robert bathing or cleaning guns yet?????????"

nnn. "I guess Rhonda Leshes thinks its ok to drug someone, perform oral sex and try to bite and suck their vagina off, 'FACTS' not opinion."

ooo. "...Rhonda (Long) Leshes brother was caught last night with a load of dope that came from Mark Leshes...Robert McCarver did work for Jerry two years ago before Mark and Rhonda Leshes got him hooked on dope...Jail...Ricky Long, Rhonda's brother is bonded out of Jail for being caught with Mark Leshes dope. 'FACTS'..."

ppp. "What the paper don't say is the victim was drugged by Mark Leshes, and as she was waking up Rhonda[Long]Leshes was performing oral sex on her 'SUCKING' and 'BITING' her vagina then Mark Leshes and Robert McCarver raped her!!!!!!!!!'FACTS' with witness testimony to back it up!!!!!!!!!!...a lot more to come!!!!!!!!!"

qqq. "...the Leshes went to jail and they are going back to Jail."

rrr. "...Leshes had someone selling dope, and weed to Ray Price and his driver and others from there..."

sss. "...victims...Folks a brain dead person can answer these questions and figure out their guilty!"

ttt. "Forgot to tell you Robert McCarver said Mat from OK was also involved, and they were getting their chemicals for making meth from Mark Leshes..."

uuu. *In response to the question* "what is the active case for that is against Leshes?"—"Death of Linda Velvin son, Linda Velvin, Fraud concerning hospital and doctor. Drugs, organized crime you will all know soon..."

vvv. "...murderers..alcoholiciks...Jail..."

www. "Let us not forget Rhonda[Long]Leshes sucked and bit the victims vagina as she awoke from being drugged by Mark Leshes, then he raped her and while still groggy Rhonda gave her and oral douche?"

xxx. "Let us not Forget Rhonda Leshes sucked and bit the victims vagina then Mark Leshes and Robert McCarver raped her, then Rhonda Gave the victim another oral 'DOUCHE'!!!!!!..."

yyy. "When you Drug and 'RAPE' a helpless woman, then Rhonda Leshes tries to bite and suck her vagina off what do you think should happen?????"

zzz. "D.A. Has taped confession of Robert McCarver about the Leshes rape of the victim!!!!!!!!!! Leshes waited too long and McCarver has told the whole story..."

aaaa. "...Ricky Long her brother busted with Leshes Drugs!..."

bbbb. "...Your 'HERO' Marke Leshes, Robert McCarver and Rhonda[Long]Leshes are the ones being prosecuted and will go to jail...trio of trash...morless..."

cccc. “Ricky Long, RhondaLongLeshers Brother? Caught with a load of Mark Leshers 'DRUGS'!...”

dddd. “Ricky Long, RhondaLongLeshers Brother? Caught with a load of Mark Leshers 'DRUGS'!...”

eeee. “Ole 'HERO' Mark Leshes and Rhonda though by attacking the first inditment they would get by again with their pervision... 'HERPIES' infested scumb, woman raping, child molesting, perverted trash.”

ffff. “... 'PERVISION'... What if this was your wife Rhonda Leshes bit, suckeed and abused while performing oral sex on her while drugged and Mark and McCarver watched and laughed then raped her? What if this was your 11 year old son Mark Leshes told to tell the Judge Jerry was molesting his sister and Jerry had D.J. Sit and play with his self while Jerry watched...”

gggg. “... Rhonda Leshes, known Lisbean, pervert, orgies, comitted perjury recently at rrc court house on record... Rhonda and Mark Leshes from their attitude still don't realize they raped and molested the wrong mans family and will go to Jail...”

hhhh. “Ask Mark Leshes she [Jennifer Bench] was selling dope for him. She was probably taking a bath like Leshes ex Linda Velvin.”

iiii. “... Mark Leshes... I hope we meet then you will know the meaning of sadistic you child molesting, drug dealing woman raper...”

jjjj. “... Instead they molested, raped and tried to get his 11 year old boy to lie to the Judge. This is of record at the court house in D.J. Own words and Perjury was committed by both Rhonda Leshes and Rovert McCarver on how long and wht they did to Shannon while they kept her on drugs... 'PERVISION'...”

kkkk. “... they did not want their icture taken with the perverted slut Rhonda Leshes... Others said if Rhonda touches them ot they touch her they wash their hands and clothes. 'HERPIES' Rhonda Leshes don't care who she infects.”

llll. “Just like when Leshes have their orgies at bar above unique touch, no one is forces to attend just a bunch of perverts get together to support the orgie. This is a known fat, 'HERPIES' Rhonda and lawsuit Mark Leshes can really draw up a crowd of perverts especially Robert McCarver and his child molesting group!”

mmmm. “More of your lies! All I have talked with know Leshes is a Queer and Rhonda Leshes is a lisbon. This Leshes trash have orgies at their bar and have spread 'HERPIES'... pervision... indited...”

nenn. “Who would want to go in that 'HERPIES'[ and no telling what else ]bar, orgie club.”

oooo. “You are a liar just like the other lesher perverts!... 'AIDS' 'HERPIES'... 'VALTRESX'...”

pppp. “It's hard to read your lips with 'HERPIES' blisters like Rhonda keeps and wipe off some of the 'JISIM' you Queer!”

qqqq. “I just don't want this perverted trash to infect outhers!!!!!!!!!!!!”

rrrr. “... Leshes trash and perverted supporters hollered tora tora tora and the 'VICTOM' has dropped the monster A-bomb on you 'HERPIES' infested perverts!!!!!!... 'GUTS' 'GUTTED' 'GUTTEST'!!!!!!!!!!!!”

ssss. “They will Have another 'ORGY' spread 'HERPIES' and 'AIDS' then order some more 'VALTRESX'!!!!!!!!!!!!”

tttt. “... Old frivolous lawsuit Leshes is a known pervert.”

uuuu. “Linda Joyce Velvin, her son, and a doctor have all died. Mark Leshes the 'ANTICHRIST' has had the F.B.I. after him but just could not get a break. Clarksville D.A. Val

Varley will be the one to end this scumb rain of 'GREED' 'PERVSION' and other moroless acts!..."

vvvv. "After finding out Mark Leshar is 'QUEER'[likes men and boys] all divorce him except Rhonda[Long]Leshar because she is bysexual and both are perverts!!!!!!!!!!"

www. "...Just heard there is strong talk Mike Rice is probably the next on G.J. Hearing. No way to tell until they meet. This is not gossip, facts and I hope goed down with the rest of the perverts."

xxxx. "...Nearly all that know these perverts know their past history and call and tell me what they hear...Facts that I personaly know is this perverted trash rope has ran out..."

yyyy. "If you know anyone with information about Robert McCarver, Rhonda Leshar Or Mark Leshers "ANOMALLY" sex activity please call D.A. Val Varley 400 N. Walnut Clarksville Texas 75426#####..."

zzzz. "...McCarver, Rhonda and Mark Leshar 'PERVERTS'!..."

aaaa. "...'LOOSER PERVERT LESHAR'..."

bbbb. "...How does two back stabbing perverts like you sleep at knight?...Don't worry Mark Leshar you will get all thats coming to you. Remember 'KARMA IS A BITCH'!...the worst is yet to come!!!!!!!!!! 'YOU CAN BANK ON THAT'!!!!!!!!!!"

cccc. "...Got a little slack in my rope to hang the trio of perverts with. Will explain later."

dddd. "...'TRIO' of perverts go to Jail!!!!!!!!!! I have big plans for these perverts when they go!!!'KARMA' is a bitch!!!!!!!!!!"

eeee. "You Leshar, McCarver perverted trash, get ready we are going to start a brand new topic!!!!!!!!!!"

ffff. "...'LYING SCUMB' Leshar, McCarver 'PERVERTED' ah 'TRIO OF TRASH'..."

ggggg. "The Unique Touch you know that 'HERPIES' infested hair [sex] shop in Clarksville, all people that have been going there have their car license wrote down and checked..."

hhhhh. "Stock up on 'CLOROX'!!!!!!!!!!"

iiii. "www.youtube.com Rhonda 'HERPIES' Leshar song."

jjjj. Mark and Rhonda 'QUEEN OF HERPIES' Leshar..."

kkkk. "Don't forget to look at Rhonda Leshers mouth when you see her, they ain't fever blisters! 'HERPIES' Lady that worked at Walmart pharmacy said both take 'VALTREX' and other venerial disease antibioticks..."

llll. "I am throwing the first stone. Tell us Rhonda 'HERPIES' Leshar about Jerry!!!!!!!!"

mmmm. "Rhonda Leshar has 'HERPIES' and is spreading them!!!!!!!!"

nnnn. "NEWS FLASH::::: Mark Leshar went to texarcana hospital last night, and was diagnosed with 'HERPIES' of the butt, Rhonda[Long]Leshar has 'HERPIES' all over her body, look at her face...more charges to come...Mike Rice is going to be the kicker!!!!!!!!!"

oooo. "If you or you know anyone that has been infected with 'AIDS' , 'HERPIES' By Rhonda[Long]Leshar, Robert McCarver or Mark Leshar please call you r local health department..."

pppp. "...Ole 'Pinky', Mark Leshar is going down for the count!!!!!!!!!"

qqqq. "...Yalls asses are about to really bleed, and not from you fags humping each other. This trio of trash got in way over their head this time. Rember the FBI and outthers have been unable to bring justice to this trio of trash. Sometimes you awaken a sleeping 'JIANT' and 'KARMA' takes over!!!!!!!!!"

rrrr. "Court house janitor sent out to buy more 'CLOROX'!!!!!!!!!"

ssss. "...alcholic..."



ttttt. “How can this 'HERPIES' disease infested scumb sue anybody? ...You Lesher McCarver perverted 'HERPIES' infested scumb supporters sue me to!!!...outher...This Lesher scumb will soon be in better company that knows how to take care of perverts and child molesting trash!!!!!!!!!!!!”

uuuuu. “This Lesher McCarver perverted trash have all been infested with 'HERPIES' and are brain damaged...Shannon could not know what we did to her, 'WE' had her 'DRUGGED'!!!!!!!!!!!!”

vvvvv. “...Carol [Jerry Coyel's former wife] tried to work at the Unique Touch but Quit because Rhonda Lesher would not leave her alone, Grabbing her beautiful breast, vagina, butt and always trying to kiss her. Rhonda cornered Carol grabbing her...Carol did not want to get involved with this Lesher, McCarver scumb...'FACTS' will slaughter this perverted, slimy, scumb...”

wwwww. “You really think you and your perverted mate don't know you are both Queer, after you molest you own kids???????? You perverted piece of shit! You posted earlier you love the Leshers and what they stand for, Rape, pervision, child molesters!!!!Lie about that!!!!!!!!”

xxxxx. “Wonder if they took Robert McCarver with them to spread 'HERPIES' and probably 'AIDS'!”

yyyyy. “...The mind molestation was when Mark Lesher tried to get An 11 year old boy the victoms son to say his farher had the boy play with hiself while he watched and that the 11 year old boy saw his father having sex with his sister...The boy testified to this in court...”

zzzzz. “...Did Rhonda Lesher and Robert McCarver commit Perjury? 'YES' facts at court house...indited...There Will be a lot more to come I will share.”

aaaaa. “I have some bad news for you Lesher, McCarver lovers. Mark Lesher found out today in court that Robert McCarver was trying to make a deal, and testified that Mark Lesher is and was selling drugs...”

bbbbb. “...I bet yall are part of the perverts that go to Leshers orgie bar for 'FAGS', 'BISEXUAL', 'HERPIES' infested scumb. I bet all police and D.A. Are scared of you because if they whip your ass and blood gets on them they could catch 'AIDS' 'HERPIES' not telling what, I don't blame them!”

ccccc. “They have gone to wipe perverted Mark Leshers 'BLOODY' butt!!!!!!!!!!!! “KARMA' is what ilbedipt and me started this with, and 'KARMA' will end it!!!!!!!!!!!!”

dddddd. “Poster copies and pastes some of his/her previous posts and adds onto them--”LOOK HOW MANY TIMES LESHES PERVERTS HAVE TRIED TO GET THIS REMOVED!!!!!!!!!!!!” (x14)

eeeeee. “Bloody Flux, and prolapse is about to begin!!!!'KARMA IS A BITCH'!!!!!!!!!!!!”

fffff. “...This is the transvestite, that the leshers have orgies with...Both Leshers do 'IT' ask Dana yourself...I hope they get paid more if Rhonda gives them oral douches!!!!!!!!!!!!”

gggggg. “No fear mate the mans family they trashed on rrpolticks and called him the man of gold is tracking all post. These post can be tracked but it takes money and power and this man has a well of both,these Lesher perverts are in for a big suprise...”

hhhhhh. “The real courthouse leak, story, fact is when Rhonda Lesher or Mark Lesher come in after they leave they 'CLOROX' every where they were...”

iiiiii. “Notice if you post facts old 'HERPIES' Rhonda Lesher las it Judged, they don't want facts out!”

jjjjjj. “Rhonda darling I did miss you but knew you had a date with 'TOO HOT TOO HANDLE' in Austin where you usually go, a good looking stripper Mark pays 500.00 so you can

give her an oral douche...Said Mark watches and he freaks her out! Don't forget to take your 'VALTREX'."

kkkkkk. "Well come and get me My name and address is listed in the town I live in, I am a little fat guy just ask anyone where I live when you come most know me I am the only one around with a air strip. You might need to save them pages for bandages for your 'HERPIES'. LOL"

llllll. "Leshers at least give them 'HERPIES' for free!"

mmmmmm. "YES' but charges are even worse. They will go to Jail thats why their running!!!!!!!!!!!"

nnnnnn. "The 'PREDATORS' are cought Rhonda[Long]Lesher, Robert lynn McCarver and Mark Lesher..."

oooooo. "...Rhonda Lesher is mad because the 'ROTARY' club wont let her and Robert McCarver teach a class on how to 'DRUG' and 'RAPE'!!!!!!!!!"

pppppp. "After talking with most on the Rotary club they say Rhonda Lesher has ruind the god name of the Rotary club..."

qqqqqq. "Know thats the truth. I heard don't kiss Rhonda because she don't spit and you never know what has been in her mouth."

rrrrrr. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'..."

ssssss. "The Leshers...own this hair shop, with the [orgie] bar above. Attorney Dan Meehan of Clarksville Tx is filing a class action Law suit for victoms tha have been disease infected...If you know anyone that has veen infected by this 'TRIO OF TRASH' please call!"

tttttt. "...Rhonda[McCarver]Lesher gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhar Mark Lesher and 'ROBERT MCARVER' raped her!..."

uuuuuu. "Mark Lesher is in another 'WORLD'! The 'WORLD OF DRUGS'!"

vvvvvv. "If you or you know anyone that was 'MOLESTED' by Mark Lesher or Rhonda [McCarver]Lesher call Attorney Dan Meehan. If you were infected with 'HERPIES', 'AIDS' or outhar infectious diseases from the Leshers call his office immediately!..."

wwwwww. "...Lesher has a history of getting away with disgusting acts!..."

xxxxxx. "...We thought you knew everything, 'EVERYTHING' about Rhonda[McCarver]Leshers 'BUTT TONGUE', orgies, 'HERPIES'!"

yyyyyy. Reposted-- "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Lesher! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!..."

zzzzzz. "...you 'HERPIES' infested 'SLUT'! You Rhonda and Sharla woods probably at up by now!"

aaaaaa. "...give this 'FOOL' a gift certificate to the 'UNIQUE TOUCH' for Rhondas famous 'BUTT TONGUE' jobs!..."

bbbbbb. "These 'FOOLS'- 'PERVERTS' think Rhonda 'SUCKING' and 'BITING', while performing an 'ORAL DOUCHE' on a 'DRUGGED' woman is natural!"

cccccc. "...Rhonda[McCarver]Lesher gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhar Mark Lesher and 'ROBERT MCARVER' raped her!..."

dddddd. “They are 'PERVERTED SCUM!' Their brains are infected by 'HERPIES' and their 'BUTTS' are sore from Rhonda's 'BUTT TONGUE' that is why they are 'FOOLS!'”  
 eeeeeee. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCARVER' raped her!...”  
 fffffff. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCARVER' raped her!...”  
 ggggggg. “I heard you were tied up at the Leshners compound, and you liked being their slave! While being tied up does Rhonda 'TONGUE' your 'BUTT'? Do you get to join on their 'ORGIES' or just 'WATCH'! Heard Mark was at radio shack buying more batteries for their 'VIBRATORS'. Do you have 'HERPIES' now?”  
 hhhhhhh. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking from being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”  
 iiiiiii. “When the Leshners, 'ROBERT MCCARVER', Mike Rice are ask about the 'DOPE' leshner was growing around the creeks on the land Leshner put in Rices name Shannon can identify and they 'LIE' and 'AEROL' pictures are shown what will the jury think?...This will be another nail in their 'COFFIN'!When Leshner says I never paid for or sold 'DRUGS', and there is witness testimony, 'TOAST'!...”  
 jjjjjjj. “...Rhonda you already perjured yourself on record!...”  
 kkkkkkk. “With all these Blacks coming to town, I bet Rhonda is slobbering at the mouth like a mad dog, 'TONGUE' hard and ready!”  
 lllllll. “Wonder how many at the Ralley were infected with 'DISEASES' from Mark and Rhonda?  
 mmmmmmm. “...I guess 'PINKY' Mark Leshner is probably paying Stacy or giving him 'DRUGS' to let him play with his balls! I could be he likes Rhonda's 'BUTT TONGUE'!...”  
 nnnnnnn. “...The only thing that was wrong with Shannon, was Leshner had her hooked on drugs!...”  
 ooooooo. “...Wonder how many Rhonda tried to get to the 'UNIQUE TOUCH', or the var above for a 'RIM JOB' while Mark Leshner 'WATCHED'?”  
 ppppppp. “...go to the 'UNIQUE TOUCH' and her 'TONGUED' by Rhonda...”  
 qqqqqqq. “I think that Buddy fellow must go to the 'UNIQUE TOUCH' [properly named] and Rhonda gave him her 'FAMOUS' [to perverts] 'BUTT TONGUE' job... Wonder if Mark Leshner watched and played with his balls?  
 rrrrrrr. “We just found out Mark Leshner went to the Texarkand Hospital for a rash on his Butt. Robert McCarver was telling this to a member of his family that told us. We were told Leshners Rectum was eat up with 'HERPIES'!...”  
 sssssss. “I have 'POSTED' several times This 'LESHNER', 'ROBERT MCCARVER' scum are 'INFESTED' with 'DISEASES'!...”  
 ttttttt. “...Mark Leshners 'BUTT' is tore up by Rhonda the 'TONGUE'! Leshners Lawyers are also tearing that 'BUTT' up!...”  
 uuuuuuu. “... 'DOCKMENTS'? You mean a made up story by Mark Leshner, like the one where he Told D.J. To tell the Judge, Jerry had sex with his sister and had him play with himself

while Jerry atched...'TRIO OF TRASH'...'SCUMB'...Rhonda comitted perjury!...Robert McCarver comitted perjury!..."

vvvvvvv. "This 'PERVERTED' bunch used a kid, kin to Rhonda to find the true story out. These 'SLIMY' 'TRASH' then made up this goofy story. After the CPS talked with all the kids They now know what pieces of 'SHIT' this 'SCUMB' is. All they done was cause another family trouble. 'WHY'??? 'THEIR PURE WHITE CHILD MOLESTING TRASH'!!!"

wwwwwww. "...I am sure the C.P.S. Tells you every thing they do! Speaking of Dogs, Do you do Sharla Woods 'DOGS' with her and Rhonda? Or just watch? HA HA HA Do the Dogs take 'VALTREX'?"

xxxxxxx. "...Well Bill Woods you 'CHILD MOLESTING' trash, and Sharla Woods, ex 'STRIPPER' 'WRINKLED' up old hag. You still have your dogs! And Mark and Rhonda [long]Lesher you plan is not working. But you still have you 'HERPIES' infested 'ORGIE' bar and your 'PERVERTED' friends like 'ROBERT' MCCARVER' and his 'CHILD MOLESTING FAMILY'!..."

yyyyyyy. "...Lesher, McCarver, Woods...'HERPIES' and 'AIDS' has affected their brain, if they had one!"

zzzzzzz. "...Rhonda[McCarver]Lesher gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each outhar Mark Leshar and 'ROBERT MCARVER' raped her!..."

aaaaaaaa. "On of 'ROBERT MCCARVERS' family members that he talks to and 'BRAGS' Mark Leshar gives him a double dose of 'VIAGRA' to mount Rhonda while he watches and plays with his and Roberts 'PINKY'!..."

bbbbbbbbb. "...Rhonda[McCarver]'SLUT Leshar... After Leshers Lawyers 'BLEED' him dry, they will go to Jail and my Kin will greet Them!!!!!!!"

ccccccc. "Rhondas 'SUCK' and 'BITE' marks on her Vagina werent caused by and illusions! Rhonda[McCarver]Leshar 'SUCKED' and 'BIT' her Vagina raw. The investigatoe looked at them and said it was a sign of passion! Rhonda is a 'SICK PERVERTED SLUT'! She even had 'SUCK' marks on her 'BUTT'! Rhonda 'TONGUED AND SUCKED' her 'BUTT'!"

dddddddd. "This Linda Velvin was with Leshar when he tried to sell Jerry 'ILLEGAL' Drugs!..."

eeeeeee. "...'DUH' I think they finally tried to 'BACK STAB' the wrong man!... I bet the 'VICTIMS' vagina Rhonda 'SUCKED' and 'BIT' will be the most expensive 'PUSS' the 'SLUT' ever ate!!!"

fffffff. "Wonder if they get someone to air this, will the Woods, Leshers and McCarver want to also let them teach a clas on how to perform a 'ORAL DOUCHE' by Rhonda, 'SUCKING' and 'BITING' a victoms Vagina, then after playing with their self and each outhar Mark Leshar and 'ROBERT MCCARVER' 'RAPE' the victom while being 'DRUGGED'! Then let Bill Woods and Sharla Woods with them, and 'ROBERT MCCARVER' tell how to 'MOLEST CHILDREN' sell 'DRUGS', make 'DRUGS' have 'ORGIES' and 'LIE'!"

gggggggg. "...Shannon said she was 'RAPED' by two little limp pinkies. She said Rhondas tongue was longer and harder than Leshers and McCarvers 'PINKIES'!... Rhonda while 'SUCKING' and 'BITING' her Vagina was a lot better liiking down there than that nasty looking McCarver! Shannon said Leshers ask her about an orgie before they drugged her. She said Rhonda was drinking and kissing on her trying to kiss her mouth..."

hhhhhhh. "...the 'LESHER, 'MCCARVER' 'PERVERTS' because they 'RAPE' Women and Children!..."

iiiiiii. "...Rhonda[McCarver]Leshner 'TONGUES BUTTS!' 'ROBERT MCCARVER' is a 'CHILD MOLESTER!..."

jjjjjjj. "...Packages from Rhondas 'UNIQUE TOUCH!' Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."

kkkkkkkk. "The girls car was found very near wheret 'ROBERT MCCARVER' was staying with a bunch of Dope Heads. Mark Leshner was furnishing her and them Drugs, McCarver said so hiself!...Dockments..."

lllllll. "Mark Leshner bonds his 'LOVER' Robert McCarver out of Jail again...Robert McCarver has confessed to the 'TRIO OF TRASH' Agg sexual assault charges to Sheriff Reed and D.A. Val Varley...outher...Rhonda Leshner was heard screaming at Mark about their 'LOVE NEST' by Allen Lumber delivery man...victoms..."

mmmmmmmm. "Attorney Dan Meehan in Clarksville Texas is filing a class action law suit Against Rhonda Leshner and The 'UNIQUE TOUCH' hair salon she owns with an 'ORGIE' bar above. The Leshners have infected several people with 'HERPIES'. Three Black men have come forward after sexual contact with the Leshners that have tested positive for 'HERPIES' and 'AIDS!' Call the Attorney if you have any contact with the Leshners!"

nnnnnnnn. "...'THE OUTHER THINGS THE LESHNER MCCARVER TRIO OF TRASH' have been involved in! 'DRUGS, 'RAPE',..."

oooooooo. "When Rhonda Leshner was 'SUCKING AND BITING' the vitims vagina, and Mark Leshner and Robert Lynn McCarver 'RAPED' her did they stop. When they 'DRUGGED' they victim did they have mercy. Robert McCarver has confessed to their crimes, on tape and recorded..."

pppppppp. "...this 'TRIO OF TRASH' has a 'PERVERTED' 'CRIMINAL' history and the Leshners ask for the change of venu. 'WHITE CRIMINAL, CHILD MOLESTING, DRUG HEADED SCUMB!'"

qqqqqqqq. "...moreless...this 'TRIO of TRASH'...'SCUMB'...Jail..."

rrrrrrrr. Reposted several other posts including changed words to the voicemail from Shannon to her sister-- "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

ssssssss. "...The bar above the 'UNIQUE TOUCH' they own is a known orgie, swingers bar!..."

ttttttt. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

uuuuuuuu. "...Mark Leshner posted this according to an employee of thiers. They thought this was 'DISGUSTING' and are looking for another Job. This shows how 'SICK' Leshner and his followers are. Adults bashing Adults is one thing, but when you stoop low enough to spread 'LIES' and 'GOSSIP' about kids this shows how sick and desperate they are! PURE WHITE TRASH!!!"

vvvvvvvv. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG'

Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

wwwwwwww. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCCRIVER' raped her!...”

xxxxxxx. “Get your free 'HEMMORID' massage [SUCKED} by Rhonda[McCarver]Leshner, while Mark Leshner the 'WATCHER', 'WATCHES!’”

yyyyyyyyy. Reposted-- “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

zzzzzzzz. “Go see Rhonda at the Unique Touch for the 'TONGUE' Job of your life! Hahhahahaha”

aaaaaaaaa. “...Leshner...mostly represents, 'CHILD MOLESTERS' 'DRUG HEADS' 'PERVERTS' that are 100% guilty! But Leshner loves 'PERVERTS' and 'DRUGS!’”

bbbbbbbbbb. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

cccccccc. “Take a close look at these two 'SLIME BALLS'! They 'DRUGGED' and 'RAPED' a Lady with the help of 'ROBERT MCCRIVER'! This 'WHITE TRASH' is going to trial, then Jail in January in 'COLLIN COUNTY'! 'KARMA IS A BITCH!’”

dddddddddd. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

eeeeeeee. Reposted-- “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCCRIVER' raped her!...”

fffffff. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

ggggggggg. “I heard she was caught with her 'TONGUE' up her dogs ass!”

hhhhhhhhh. “And Rhonda and her 'BUTT TONGUE' goes to Jail! hahhahahaha”

iiiiiiii. “How many people have this 'TRIO OF TRASH' infested with 'DISEASES'?????”

jjjjjjjj. “...Can you imagine Rhonda[McCarver]Leshners 'HERPIES' infested 'TONGUE' up your 'BUTT'!??? 'NASTY PERVERTED SHIT EATING BITCH'!!! 'YUCK!’”

kkkkkkkkk. “Mark Leshner supplied her 'DRUGS', 'ROBERT MCCRIVER' stayed down the street from where her car was found! 'ROBERT MCCRIVER' was seen earlier with her! You figure it out!”

llllllll. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCCRIVER' raped her!...”

mmmmmmmm. “Wonder how many 'BUTTS' Rhonda has 'TONGUED'? Wonder how many 'PRICKS' Mark Leshner has bent over for, and 'SUCKED'?”

nnnnnnnn. “Rhonda Leshar 'THREATENS' Rotary Club!...'VICTOM'...'HERPIES'...we drugged a 'VICTOM' I was giving her an 'ORAL DOUCHE'...Mark Leshar and Robert McCarver after playing with thierself and each outhar 'RAPED' her anyway!...”

oooooooo. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

ppppppppp. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

qqqqqqqqq. “Rhonda did you 'TONGUE' their 'BUTTS' before or after this Picture?”

rrrrrrrr. “Just saw this picture, Rhonda[McCarver,Leshar] must be advertising for her orgie Bar! Told you the 'PERVERTS' are sick!...”

sssssssss. “...why would anyone in their right mind want a known 'DOPE HEAD', 'DRUG DEALER' 'THIEF', 'CHILD MOLESTER' with family history of same, cought with 51 sticks of 'DYNAMITE', already holding several felony bonds on want this 'PERVERT' living with them unless their 'PERVERTS' also!”

tttttttt. “Get free 'HERPIES' here! Blow J extra, Oral Sex extra, we 'SWALLOW' Mark Leshar bends over and breaks open like a 10 gage shot gun. Aids? Come at your own risk, but we have the biggest and best vibrators operated by down the old dirt road Rhonda[slut]Leshar!”

uuuuuuuuu. “...these fine Christian Hypocrits get their 'DRUGS' 'LIQUOR', and 'HERPIES' from the 'TRIO OF TRASH', 'ROBERT MCCARVER” Rhonda [McCarver Long]Leshar and Mark[fag]Leshar! These 'PERVERTS' get on their nees alot, but not to pray!”

vvvvvvvvv. “A patron was at the 'UNIQUE TOUCH' for a 'TONGUE' Job. People heard the man hollaring I gotta 'SH\*T'! Rhonda had her 'TONGUE' up his butt and said 'SH\*T' around it if you think you can!...”

wwwwwwwww. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshars 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshar was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

xxxxxxxxxx. “Rhonda the 'BUTT' 'TONGUER'!”

yyyyyyyyyy. “'QUEERS' lke Leshar!...”

zzzzzzzzz. “Mark Leshar and 'ROBERT MCCARVER', 'LOVERS'!...”

aaaaaaaaaa. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

bbbbbbbbbb. Reposted-- “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

cccccccc. “The Unique Touch hair salon is below this 'ORGIE' bar. The *[n.b. Unique Touch]* is known to be 'DISEASE INFESTED'

dddddddddd. “...Rhonda...is telling all that will listen to her,anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her,because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHER...Rhonda Leshar now has insulted the Grand Jury...”

eeeeeeee. lou Reposted several other posts including changed words to the voicemail from Shannon to her sister-- “...'HERPIES' and 'AIDS'...RECORDING BETWEEN Mark Leshar AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda

is not here ...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."  
ffffff. "Rhonda 'LOVES' dark meat! Either sex!!"  
ggggggggg. "Robert McCarver A known 'CRIMINAL'...has a history of 'CHILD MOLESTING'...McCarver selld drugs for Mark Leshner and has confessed to the D.A.Val Varley and Sheriff Terry Reed..."  
hhhhhhhhh. "...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!..."  
iiiiiii. "''DELIVERANCE' is what comes to mind! When Mark Leshner goes to 'HUNTSVILLE' prison will he squeel like a 'STUCK' pig?...Inmates hate 'CHILD MOLESTERS' and 'WOMEN RAPIST'!..."

1819. The statements involved a private matter.

1820. Alternatively, the statements involved a public matter.

1821. The statements referred to plaintiffs by name and/or indirectly.

1822. The statements were defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1823. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1824. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1825. Additionally and/or alternatively, the statements were defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1826. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1827. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1828. Additionally and/or alternatively, the statements were defamatory because it unambiguously accused the Plaintiffs of committing a crime.

1829. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1830. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of committing a crime by implication.



1831. Additionally and/or alternatively, the statements were defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

1832. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1833. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1834. The statements were false because Plaintiffs does not have the loathsome disease imputed by the Defendant.

1835. Additionally and/or alternatively, the statements were false because Plaintiffs did not commit the crime that they were accused of committing.

1836. Additionally and/or alternatively, the statements were false because Plaintiffs did not engage in said sexual misconduct.

1837. Additionally and/or alternatively, the statement were false because Plaintiffs did not engage in conduct injuring his and/or her occupation.

1838. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1839. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1840. Plaintiffs seek unliquidated damages within the jurisdictional limits of this court.

1841. Exemplary damages. Plaintiffs injuries resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 1326-1558- Defamation per se

1842. Defendant's written statement(s) described in Count 1083-1325 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1843. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1844. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1845. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1846. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1847. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1568-1811– Libel per se

1848. Defendant's written statement(s) described in Count 1083-1325 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1849. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1850. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

1851. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 1812 – 1813 – Defamation

##### Lou 2

1852. Defendant published a statement by written communication asserting as fact that,

- a. “This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”
- b. Lou 2 “Does this mean Rhonda[Long]Lesher will start her act by sucking a golf ball through a 100ft water hose?...outhers...Will Mark Lesher tell about the land he put in Mike Rices name to grow 'DOPE'...”

1853. The statements involved a private matter.

1854. Alternatively, the statements involved a public matter.

1855. The statement referred to plaintiffs by name and/or indirectly.

1856. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

1857. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

1858. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

1859. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of a crime.

1860. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

1861. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

1862. The statements were false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

1863. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1864. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1865. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

1866. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1867. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1814-1815- Defamation per se

1868. Defendant's written statement(s) described in Count 1812-1813 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1869. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1870. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1871. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1816-1817- Libel Per Se

1872. Defendant's written statement(s) described in Count 1812-1813 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1873. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1818-1822

lou wife

1874. Defendant published a statement by written communication asserting as fact that,

- a. “Wonder if ole 'PINKY HERO' Mark Leshar wishes they had molested someone elses family besides Jerry? What this trash will find out is Jerry won't let up until 'JUSTICE' is served!!!!!!!!!!”
- b. “Police are still running licen plates and watching the 'UNIQUE TOUCH' and bar above. Two more drug arrest were made!!!!!!!!!!!!!!”
- c. “...Police are still running licen plates and watching the 'UNIQUE TOUCH' and bar above. Two more drug arrest were made!!!!!!!!!!!!!!”
- d. “When his wifes cought Leshar with men they divorced him!!!!!!!!!!!!!!”
- e. “Robert McCarver is at Leshars compound feeding Mark Leshar!!!!!!!!!!\$20.000.00 bail to get Robert out of Jail is sure 'QUEER'!!!!”

1875. The statements involved a private matter.

1876. Alternatively, the statements involved a public matter.

1877. The statements referred to plaintiff by name and/or indirectly.

1878. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

1879. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

1880. Additionally and/or alternatively, the statement were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

1881. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1882. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

1883. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

1884. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of committing a crime.

1885. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

1886. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

1887. The statements were false because Plaintiffs did not commit the crime that they were

accused of committing.

1888. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in said sexual misconduct.

1889. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in conduct injuring his and/or her occupation.

1890. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1891. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1892. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1893. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1823-1827– Libel per se

1894. Defendant's written statement(s) described in Count 1823-1827 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1895. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

1896. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

### Counts 1828-1832- Defamation per se

1897. Defendant's written statement(s) described in Count 1823-1827 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1898. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1899. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1900. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1901. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

### Counts 1833-1839 – Defamation louis

1902. Defendant published a statement by written communication asserting as fact that,

a. “Big mouth, little 'PINKIES' tore up butts! Rhonda[McCarver,Long]Leshner, 'ROBERT MCCARVER' Mark Leshner, Bill[blow hard]Woods and Sharla[slut]Woods! They will be 'HUMPING' around tonight! Leshners compound will have the 'HERPIES' and 'DODO' flying!...”

b. “Mark Leshner and Rhonda[McCarver,Long]Leshner, We over heard some weird looking people in the Mexican Restaurant Talking about Your 'ANNUAL BLOW JOB' contest at your 'ORGIE' bar! They said it is not fair for Mark to enter this year for the mens, and sure not fair for Rhonda to enter either! They said yall should give someone else a chance to win. They thought yall and Bill and Sharla woods were close last year, but Mark just had to much suction! 'YUCK!'”

c. “...That tongue has to have been fertilized, Wonder how many 'RIM' jobs that 'SLUT' has done? Rhonds[McCarver,Long]Leshner, 'ROBERT MCCARVER', Mark Leshner, and the 'TONGUER'!... No wonder Rhondas breath smells like 'POOP!'”

d. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...” (x4)

1903. The statements involved a private matter.

1904. Alternatively, the statements involved a public matter.

1905. The statements referred to plaintiff by name and/or indirectly.

1906. The statements were defamatory because they unambiguously accused the Plaintiff of

sexual misconduct.

1907. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

1908. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

1909. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of a crime.

1910. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

1911. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

1912. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of having a loathsome disease.

1913. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of having a loathsome disease by innuendo.

1914. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of having a loathsome disease by implication.

1915. The statements were false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1916. Additionally and/or alternatively, the statements were false because Plaintiff does not have said loathsome disease.

1917. Additionally and/or alternatively, the statements were false because Plaintiff did not commit said crime.

1918. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1919. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1920. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1921. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).



More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1840-1846– Libel per se

1922. Defendant’s written statement(s) described in Count 1833-1839 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1923. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) published his or her respective interpretations of Plaintiff’s natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

1924. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 1847-1853- Defamation per se

1925. Defendant’s written statement(s) described in Count 1833-1839 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1926. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1927. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1928. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1854 – Defamation louis white

1929. Defendant published a statement by written communication asserting as fact that, "...these Lesher McCarver 'PERVERTS' and their supporters don't won't me and ilbedipt to keep yall informed of the truth and 'FACTS'...See the 'TRASH' and lies they post!..."

1930. The statement involved a private matter.

1931. Alternatively, the statement involved a public matter.

1932. The statement referred to plaintiff by name and/or indirectly.

1933. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1934. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1935. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1936. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

1937. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1938. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

1939. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

a. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 1855- Defamation per se

1940. Defendant's written statement(s) described in Count 1854 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

1941. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1856– Libel Per Se

1942. Defendant's written statement(s) described in Count 1854 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

1943. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1857-1858 – Defamation lous Goat

1944. Defendant published a statement by written communication asserting as fact that,

a. "...lou left me out grazing and this Lesher, McCarver Queers found me and tried to do the same to me as they did to the victim. They tried to 'SUCK' 'BITE' my little weewe off."

b. "Unique Touch, I'll bet!!!!!! You get throwed, blowed, bit, sucked, Herpies, and your hair done at the same place, 'YUCK!!!!!!!!!!'"

1945. The statements involved a private matter.

1946. Alternatively, the statements involved a public matter.

1947. The statements referred to plaintiffs by name and/or indirectly.

1948. The statements were defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1949. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1950. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1951. Additionally and/or alternatively, the statements were defamatory because it

unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

1952. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

1953. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

1954. Additionally and/or alternatively, the statements were defamatory because it unambiguously accused the Plaintiffs of committing a crime.

1955. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1956. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of committing a crime by implication.

1957. Additionally and/or alternatively, the statements were defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

1958. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

1959. Additionally and/or alternatively, the statements were defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

1960. The statements were false because Plaintiffs does not have the loathsome disease imputed by the Defendant.

1961. Additionally and/or alternatively, the statements were false because Plaintiffs did not commit the crime that they were accused of committing.

1962. Additionally and/or alternatively, the statements were false because Plaintiffs did not engage in said sexual misconduct.

1963. Additionally and/or alternatively, the statement were false because Plaintiffs did not engage in conduct injuring his and/or her occupation.

1964. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1965. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

1966. Plaintiffs seek unliquidated damages within the jurisdictional limits of this court.

1967. Exemplary damages. Plaintiffs injuries resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1859-1860- Defamation per se

1968. Defendant's written statement(s) described in Count 1857-1858 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1969. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

1970. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1971. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

1972. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1973. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1861-1862– Libel Per Se

1974. Defendant's written statement(s) described in Count 1857-1858 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1975. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1863- Defamation  
lous owl

1976. Defendant published a statement by written communication asserting as fact that, “...outhers...If one held my wife two weeks, 'DRUGGED' and 'RAPER' her as Mark Lesher has done, while trying to stab me in the back, even after them mooching off me for years and never done anything to offend them, I think I might handle it differently! I sure jerry has a plan to see Mark Lesher for sure will pay for his sins...”

1977. The statement involved a private matter.

1978. Alternatively, the statement involved a public matter.

1979. The statement referred to plaintiff by name.

1980. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

1981. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

1982. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

1983. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

1984. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

1985. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

1986. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

1987. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

1988. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

1989. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

1990. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

1991. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1864 – Libel Per Se

1992. Defendant's written statement(s) described in Count 1863 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

1993. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1865 - Defamation per se

1994. Defendant's written statement(s) described in Count 1863 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

1995. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

1996. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

1997. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1866-1867 – Defamation louswife

1998. Defendant published a statement by written communication asserting as fact that,

a. "...Sharla [Woods] likes buying Chassitty's half black baby clothes and like taking Lay and Shady McCarver shopping she is trying to buy them and for what reason???...Sharla Woods and Rhonda Leshner are both alcoholics and Bill [Woods] and Mark [Leshner] take viagra and watch the dogs go at Sharla Woods and Rhonda Long Leshner."

b. "...They are alcoholics..."

1999. The statements involved a private matter.

2000. Alternatively, the statements involved a public matter.

2001. The statements referred to plaintiff by name and/or indirectly.

2002. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

2003. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

2004. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

2005. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of a crime.

2006. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

2007. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

2008. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2009. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2010. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2011. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2012. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.



2013. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1868-1869- Defamation per se

2014. Defendant's written statement(s) described in Count 1866-1867 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2015. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2016. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2017. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1870-1871 – Libel Per Se

2018. Defendant's written statement(s) described in Count 1866-1867 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2019. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1872-1874 - Defamation loutlbedipt

2020. Defendant published a statement by written communication asserting as fact that,

- a. "...others...Robert McCarver has confessed...Sorcer said Lesher has a whole Law firm working on this. Lesher knows if they go to trial they will get convicted..."
- b. "Their will be a trial! All Judges know what a snake Lesher is, Collin County will convict this 'TRIO OF TRASH!'..."
- c. "...All I have posted about Rhonda and her 'VIBRATORS' is true!...Lesher thinks all women are Ho\*es. Rhonda is bysexual and a pure 'SLUT!'"

2021. The statements involved a private matter.

2022. Alternatively, the statements involved a public matter.

2023. The statements referred to plaintiff by name and/or indirectly.

2024. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

2025. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

2026. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

2027. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2028. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

2029. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

2030. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of committing a crime.

2031. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

2032. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by implication.

2033. The statements were false because Plaintiffs did not commit the crime that they were accused of committing.

2034. Additionally and/or alternatively, the statements were false because Plaintiff did not

engage in said sexual misconduct.

2035. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2036. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2037. Defendant's false statements caused injury to plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.

2038. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2039. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1875-1877 – Defamation per se

2040. Defendant's written statement(s) described in Count 1872-1874 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2041. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2042. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2043. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2044. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 1878-1880– Libel per se

2045. Defendant’s written statement(s) described in Count 1872-1874 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2046. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

2047. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 1881-1882 – Defamation

louu

2048. Defendant published a statement by written communication asserting as fact that,

a. “This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

b. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Lesher! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”

2049. Defendant published a statement by written communication asserting as fact that,

2050. The statement involved a private matter.

2051. Alternatively, the statement involved a public matter.

2052. The statements referred to plaintiff by name and/or indirectly.

2053. The statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

2054. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

2055. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

2056. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of a crime.

2057. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of committing a crime by innuendo.

2058. Additionally and/or alternatively, the statements were because they accused the Plaintiffs of committing a crime by implication.

2059. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiffs of having a loathsome disease.

2060. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of having a loathsome disease by innuendo.

2061. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of having a loathsome disease by implication.

2062. The statements were false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2063. Additionally and/or alternatively, the statements were false because Plaintiff does not have said loathsome disease.

2064. Additionally and/or alternatively, the statements were false because Plaintiff did not commit said crime.

2065. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2066. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2067. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2068. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1883-1884– Libel Per Se

2069. Defendant’s written statement(s) described in Count 1881-1882 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2070. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1885-1886- Defamation per se

2071. Defendant’s written statement(s) described in Count 1881-1882 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2072. Further, Defendant’s written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2073. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2074. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2075. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1887 – Defamation

louuou

2076. Defendant published a statement by written communication asserting as fact that, “And don't forget Kenny did not call the police??? Reckon ole 'PINKE' the 'HERO' made this up for another front page edition!!! How may 'LIES' foes this 'FREEK' Mark Lehser have in him? Rhondas 'BUTT TONGUE' mist have shattered his brain...”

2077. The statement involved a private matter.

2078. Alternatively, the statement involved a public matter.

2079. The statement referred to plaintiff by name and/or indirectly.

2080. The statement was defamatory because it unambiguously accused the Plaintiffs of sexual misconduct.

2081. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2082. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2083. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2084. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2085. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2086. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2087. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1888– Libel per se

2088. Defendant's written statement(s) described in Count 1887 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2089. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

2090. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

2091. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Count 1889 - Defamation per se

2092. Defendant's written statement(s) described in Count 1887 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2093. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1890-1891 – Defamation

louuu

2094. Defendant published a statement by written communication asserting as fact that,

a. “If you are not scared of 'HERPIES' or 'AIDS' go to the 'UNIQUE TOUCH', ask for “RHONDA' the 'TONGUE'!”

b. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were in-pounded for 'HERPIES'! This is one sick 'SLUT'!...”

2095. The statement involved a private matter.

2096. Alternatively, the statement involved a public matter.

2097. The statement referred to plaintiff by name and/or indirectly.

2098. The statements were defamatory because they unambiguously accused the Plaintiff of having a loathsome disease.

2099. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by implication.

2100. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by innuendo.

2101. The statements were defamatory because they unambiguously accused the Plaintiff of



sexual misconduct.

2102. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

2103. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

2104. The statements were false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2105. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in said sexual misconduct.

2106. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2107. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2108. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2109. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1892-1893 --Defamation per se

2110. Defendant's written statement(s) described in Count 1890-1891 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2111. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2112. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2113. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2114. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1894-1895 – Libel Per Se

2115. Defendant's written statement(s) described in Count 1890-1891 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2116. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1896 – Defamation

louuuu

2117. Defendant published a statement by written communication asserting as fact that, "Rhonda[McCarver,long]Leshner had her 'LONG' nasty 'TONGUE' working overtime!"

2118. The statement involved a private matter.

2119. Alternatively, the statement involved a public matter.

2120. The statement referred to plaintiff by name.

2121. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2122. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2123. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2124. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2125. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2126. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2127. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

a. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1897– Libel Per Se

2128. Defendant's written statement(s) described in Count 1896 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2129. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1898 - Defamation per se

2130. Defendant's written statement(s) described in Count 1896 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2131. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1899 – Defamation

louuuuu

2132. Defendant published a statement by written communication asserting as fact that, “I know Rhonda[McCaver,long]Leshner took her 'TONGUE' and stuck it up Mark and Roberts 'BUTT'!...”

2133. The statement involved a private matter.

2134. Alternatively, the statement involved a public matter.

2135. The statement referred to plaintiff by name.

2136. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2137. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2138. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2139. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

2140. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2141. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.

2142. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2143. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1900– Libel Per Se

2144. Defendant’s written statement(s) described in Count 1899 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2145. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1901 - Defamation per se

2146. Defendant’s written statement(s) described in Count 1899 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2147. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1902 – Defamation McCoy

2148. Defendant published a statement by written communication asserting as fact that, “NAW' Rhonda has 'HERPIES'! You seem to know all about Rhondas 'TONGUE'!!!”

2149. The statement involved a private matter.

2150. Alternatively, the statement involved a public matter.

2151. The statement referred to plaintiff by name.

2152. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2153. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2154. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2155. The statement was defamatory because it accused the Plaintiffs of sexual misconduct by

innuendo.

2156. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2157. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2158. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2159. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2160. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2161. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2162. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1903– Libel Per Se

2163. Defendant's written statement(s) described in Count 1902 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2164. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1904 - Defamation per se

2165. Defendant's written statement(s) described in Count 1902 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2166. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1905 – Defamation  
McKoy

2167. Defendant published a statement by written communication asserting as fact that, "...It's Rhonda with het 'TONGUE' hung in their 'BUTTS', Mark 'WATCHING' and 'LICKING' up the Juice!"

2168. The statement involved a private matter.

2169. Alternatively, the statement involved a public matter.

2170. The statement referred to plaintiff by name.

2171. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2172. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2173. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2174. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2175. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2176. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2177. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2178. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).

More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1906- Defamation per se

2179. Defendant's written statement(s) described in Count 1905 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2180. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1907 – Libel Per Se

2181. Defendant's written statement(s) described in Count 1905 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2182. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1908-1911 – Defamation mee

2183. Defendant published a statement by written communication asserting as fact that,

- a. "AGREE' Rhonda is a skank ho! Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit...Many said Mark[the tongue] was MR. Clean for butts!"
- b. "Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."
- c. "...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."



d. “Agree, 'RHONDA' is a skank ho! Packages from Rhondas 'UNIQUE TOUCH!' Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

2184. The statements involved a private matter.

2185. Alternatively, the statements involved a public matter.

2186. The statements referred to plaintiff by name and/or indirectly.

2187. The statements were defamatory because they unambiguously accused the Plaintiff of having a loathsome disease.

2188. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by implication.

2189. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of having a loathsome disease by innuendo.

2190. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of sexual misconduct.

2191. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by innuendo.

2192. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiffs of sexual misconduct by implication.

2193. Additionally and/or alternatively, the statements were defamatory because they unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2194. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

2195. Additionally and/or alternatively, the statements were defamatory because they accused the Plaintiff of conduct that injured his and/or her professional occupation.

2196. The statements were false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2197. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in said sexual misconduct.

2198. Additionally and/or alternatively, the statements were false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2199. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2200. Defendant's false statements caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2201. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2202. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1912-1915--Defamation per se

2203. Defendant's written statement(s) described in Count 1908-1911 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2204. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2205. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2206. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2207. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1916-1919– Libel Per Se

2208. Defendant's written statement(s) described in Count 1908-1911 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s)

injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2209. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1920 – Defamation  
Morless People

2210. Defendant published a statement by written communication asserting as fact that, "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!"

2211. The statement involved a private matter.

2212. Alternatively, the statement involved a public matter.

2213. The statement referred to plaintiff by name and/or indirectly.

2214. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2215. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2216. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2217. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2218. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2219. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2220. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2221. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2222. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2223. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2224. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2225. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1921– Libel Per Se

2226. Defendant's written statement(s) described in Count 1920 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2227. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1922- Defamation per se

2228. Defendant's written statement(s) described in Count 1920 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2229. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 1923-1924 - Defamation  
Mose

2230. Defendant published a statement by written communication asserting as fact that,

a. “NOW MARK LESHER HAS RHONDA LONGS BROTHER HOOKED ON DRUGS AND IS USING HIM, RICKY LONG LIKE HE DID LINDA VELVINS SON...”

b. “...F.B.I. AND STATE POLICE KNOW MARK LESHER IS RESPONSIBLE FOR LINDAS SONS DEATH...”

2231. The statement involved a private matter.

2232. Alternatively, it involved a public matter.

2233. The statement referred to plaintiff by name.

2234. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2235. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2236. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2237. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2238. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2239. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

2240. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2241. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1925-1926- Defamation per se

2242. Defendant's written statement(s) described in Count 1923-1924 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2243. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1927-1928– Libel Per Se

2244. Defendant's written statement(s) described in Count 1923-1924 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2245. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1929-1930- Defamation

##### Muff Dive

2246. Defendant published a statement by written communication asserting as fact that,

a. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!"

b. "RHONDA {mccarver,long}Les her serving drinks to another 'VICTOM' at her 'ORGIE BAR'! Wonder if this fellw knows Rhonda was indicted with 'ROBERT MCCARVER' and Mark Lesher for drugging a victom? Rhonda sucked and bit her 'VAGINA' raw then Robert McCarver and Mark Lesher 'RAPED' her...outher evidence!"

2247. The statement involved a private matter.

2248. Alternatively, the statement involved a public matter.

2249. The statement referred to plaintiff by name and/or indirectly.

2250. The statement was defamatory because it unambiguously accused the Plaintiff of sexual

misconduct.

2251. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2252. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2253. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2254. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2255. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2256. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2257. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2258. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2259. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2260. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2261. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 1931-1932– Libel Per Se

2262. Defendant's written statement(s) described in Count 1929-1930 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2263. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1933-1934- Defamation per se

2264. Defendant's written statement(s) described in Count 1929-1930 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2265. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2266. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2267. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1935-Defamation Name Change

2268. Defendant published a statement by written communication asserting as fact that, "...Leshers/Mcarver raped and drugged a woman now that WRONG..."

2269. The statement involved a private matter.

2270. Alternatively, the statement involved a public matter.

2271. The statement referred to plaintiff by name.

2272. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2273. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2274. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.



2275. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2276. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2277. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2278. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2279. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2280. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2281. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2282. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2283. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1936- Defamation per se

2284. Defendant's written statement(s) described in Count 1935 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2285. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2286. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2287. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1937– Libel Per Se

2288. Defendant’s written statement(s) described in Count 1935 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2289. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1938-1939-Defamation

naw

2290. Defendant published a statement by written communication asserting as fact that,

- a. “‘HERPIES' is flourishing! At the UT!”
- b. “...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'...”

2291. Defendant published a statement by written communication asserting as fact that,

2292. The statement involved a private matter.

2293. Alternatively, the statement involved a public matter.

2294. The statement referred to plaintiff by name and/or indirectly.

2295. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2296. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2297. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2298. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2299. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by innuendo.

2300. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2301. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2302. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2303. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2304. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2305. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2306. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2307. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2308. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2309. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2310. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

2311. Defendant's written statement(s) described in Count 1938-1939 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2312. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2313. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2314. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2315. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1942-1943– Libel Per Se

2316. Defendant's written statement(s) described in Count 1938-1939 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2317. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1944-1952-Defamation News flash

2318. Defendant published a statement by written communication asserting as fact that,

a. "Robert McCarver is telling all his 'DRUG' friends, Mark Leshner said I am going to be a rich man!...'TRIO OF TRASH'...dockments...McCarver 'CONFESSED' to the 'TRIO OF TRASHES' Guilt...scumb...'LOOSER'..."

b. "Robert McCarver is telling all his 'DRUG' friends, Mark Leshner said I am going to be a rich man!...'TRIO OF TRASH'...dockments...McCarver 'CONFESSED' to the 'TRIO OF TRASHES' Guilt...scumb...'LOOSER'..."

c. "LESHNER GO BACK TO JAIL' also 'HERPIES' Rhonda Leshner Getting sued.!!!Look at sores on Rhonda nouth. Told by local Attorney.I have not been wrong yet,watch news papers you won't believe your eyes."

d. "A big black lady, just ran out of the Unique Touch hollaring, and holding her viginna screaming. She was screaming, 'HELL' Rhonda all I wanted was my hair done!"

e. "You know rrcounty cain't keep a secret, so the latest is Mark Leshners assets may be seized due to organized crime indictment..."

- f. "You guessed it, Mark Lesher may or probably will be arrested again! Next GJ to meet will hear more charges to be filed. D A would not comment by truthful source not wrong in the past says more sealed indictments to surface. Minor child is a major topic and others..."
- g. "Lots more to come says --- ----- Lesher's will be locked up again this I can promise you. Stay tuned lots more to come watch news papers I was told. I remember hearing this before and it happened."
- h. "Register for circus act by Rhonda Lesher/ Sucking golf ball through 100 ft. water hose, hide the baseball bat, most jism swallowed, most head jobs in an hour, muff diving, too many events to name. Register at unique touch clarksville texas. Mark Lesher to enter pinky contest and furnish viagra."
- i. "...Rhonda Lesher and Robert McCarver both testified under oath to two different stories and both were involved in rape. I know this for a fact I was there..."

2319. The statement involved a private matter.

2320. Alternatively, the statement involved a public matter.

2321. The statement referred to plaintiff by name and/or indirectly.

2322. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2323. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2324. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2325. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2326. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

2327. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

2328. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2329. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2330. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2331. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2332. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2333. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2334. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2335. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2336. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2337. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2338. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2339. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2340. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2341. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 1953-1961– Libel Per Se

2342. Defendant's written statement(s) described in Count 1944-1952 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2343. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1962-1970--Defamation per se

2344. Defendant's written statement(s) described in Count 1944-1952 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2345. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2346. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2347. Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2348. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2349. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1971-1973- Defamation nice

2350. Defendant published a statement by written communication asserting as fact that,

a. "...Rhonda[Long]Leshers brother Ricky Long is busted with Mark Leshers 'DRUGS'...'FACTS'"

b. "The Lesher[s] had there lawyers to file several motions...You know these 'CRIMINALS' will try to lie an wiggle as much as possible!"

c. "The ones that are twisted and sick are in Court today, Rhonda[Long]Leshes, Robert Lynn McCarver and Mark Leshes!!!! Can't wait to see the news on this 'TRIO'!!!!!!!!!"

2351. The statement involved a private matter.

2352. Alternatively, it involved a public matter.

2353. The statement referred to plaintiff by name and/or indirectly

2354. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2355. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2356. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2357. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2358. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2359. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.

2360. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2361. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1974-1976– Libel Per Se

2362. Defendant's written statement(s) described in Count 1971-1973 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2363. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.



Counts 1977-1979- Defamation per se

2364. Defendant's written statement(s) described in Count 1971-1973 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2365. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 1974 – Defamation  
no batteries needed

2366. Defendant published a statement by written communication asserting as fact that, "‘LESHER' bend over! This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

2367. The statement involved a private matter.

2368. Alternatively, the statement involved a public matter.

2369. The statement referred to plaintiff by name and/or indirectly.

2370. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2371. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2372. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2373. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2374. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2375. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2376. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2377. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2378. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2379. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2380. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2381. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 1975– Libel Per Se

2382. Defendant's written statement(s) described in Count 1974 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2383. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1976 - Defamation per se

2384. Defendant's written statement(s) described in Count 1974 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2385. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2386. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2387. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 1977-1984-Defamation

oh my

2388. Defendant published a statement by written communication asserting as fact that,

a. "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

b. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

c. "'PERVERTS' hire and run with 'PERVERTS'! Mark Leshner and Henry are butt hole buddies!..."

d. "...A 'ROPE' is what McCarver needs, not an Attorney!"

e. Reposted several other posts including changed words to the voicemail from Shannon to her sister-- "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

f. Reposted several other posts including changed words to the voicemail from Shannon to her sister-- "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'...victim...A 'ROPE' is what McCarver needs, not an Attorney!..."

g. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshners 'COMPOUND'! While the victim was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...Robert Lynn McCarver, outhere charges...A 'ROPE' is what McCarver needs, not an Attorney!..."

h. "...lesher was the one that had her on drugs with the help of McCarver selling them to her for Mark Leshner...'TRIO OF TRASH' raped her and Rhonda[Long]Leshner tried to suck her guts out she got scared a n off drugs...'SCUMBS'...Robert Lynn McCarver has 'CONFESSED' and

outher evidence raised their charges ti AggSexual assault. You Lesher perverted 'SCUMB' can lie and twist 'FACTS' but this 'TRASH' will go to Jail!!!!!!!!!!!!!!”

2389. The statement involved a private matter.

2390. Alternatively, the statement involved a public matter.

2391. The statement referred to plaintiff by name and/or indirectly.

2392. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2393. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2394. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2395. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2396. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2397. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2398. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

2399. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2400. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2401. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

2402. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2403. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 1985-1992- Defamation per se

2404. Defendant's written statement(s) described in Count 1977-1984 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2405. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2406. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2407. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 1993-2000– Libel per se

2408. Defendant's written statement(s) described in Count 1977-1984 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2409. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

2410. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2001-2002-Defamation

oink

2411. Defendant published a statement by written communication asserting as fact that,

a. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher

was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...””

b. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...””

2412. The statement involved a private matter.

2413. Alternatively, the statement involved a public matter.

2414. The statement referred to plaintiff by name and/or indirectly.

2415. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2416. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2417. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2418. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2419. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2420. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2421. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

2422. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2423. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2424. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher’s law practice, substantial damage to Rhonda Lesher’s beauty salon, embarrassment, and ostracization within the community.

2425. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2426. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2003-2004– Libel Per Se

2427. Defendant's written statement(s) described in Count 2001-2002 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2428. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2005-2006- Defamation per se

2429. Defendant's written statement(s) described in Count 2001-2002 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2430. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2431. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2432. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2006-2012-Defamation

oou

2433. Defendant published a statement by written communication asserting as fact that,

- a. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCARVER' raped her!...”
- b. “...Mark Leshner was supplying all with 'DRUGS'! 'ROBERT MCCARVER' sold an took Lehsers 'DRUGS'!...”
- c. “Wonder how many 'BUTTS' Rhonda[McCarver]Leshner has 'TONGUED'? And whos? While Mark Leshner 'WATCHED'? Mike Rice 'WATCHED'? 'ROBERT MCCARVER' 'WATCHED'? Or do they all 'TONGUE' each others 'BUTTS'? 'THE TRIO OF TRASH BUTT TONGUES'! Hahaha”
- d. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCARVER' raped her!...”
- e. “Hey Question, how many times has Rhonda 'TONGUED' your 'BUTT'??? While Mark Leshner 'WATCHED'???”
- f. “There were some 'SCUM' Mark Leshner, 'ROBERT MCCARVER' and 'Rhonda [McCarver]Leshner 'TONGUEING' peoples 'BUTTS', 'RAPING' helpless 'DRUGGED’ women but they have been indicted and are going to Jail!!!!”
- g. “...Rhonda[McCarver]Leshner gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshner and 'ROBERT MCARVER' raped her!...”

2434. The statement involved a private matter.

2435. Alternatively, the statement involved a public matter.

2436. The statement referred to plaintiff by name and/or indirectly.

2437. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2438. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2439. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2440. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2441. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2442. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2443. The statement was false because Plaintiff does not participate in the type of sexual



misconduct described in Defendant's post.

2444. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2445. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2446. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2447. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2448. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2013-2019- Defamation per se

2449. Defendant's written statement(s) described in Count 2006-2012 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2450. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2451. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2452. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2020-2026- Libel Per Se

2453. Defendant's written statement(s) described in Count 2006-2012 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s)

injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2454. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2027-2028-Defamation  
orkin needed

2455. Defendant published a statement by written communication asserting as fact that,

a. "Are you Rhondas pimp? Three black Men and several Women are filing a Lawsuit with Attorney Dan Meehan for 'DISEASES' they were infected with from 'UNIQUE TOUCH' and 'ORGIE BAR' above!"

b. "...'PERVERTS' hire and run with 'PERVERTS'?! Mark Leshner and Henry are butt hole buddies!..."

2456. The statement involved a private matter.

2457. Alternatively, the statement involved a public matter.

2458. The statement referred to plaintiff by name and/or implication.

2459. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2460. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2461. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2462. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2463. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2464. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2465. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2466. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2467. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2468. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2469. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2470. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2471. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2472. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2473. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2474. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2029-2030– Libel Per Se

2475. Defendant's written statement(s) described in Count 2027-2028 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2476. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2031-2032--Defamation per se

2477. Defendant's written statement(s) described in Count 2027-2028 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2478. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2479. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2480. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2481. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2033-Defamation  
oulu

2482. Defendant published a statement by written communication asserting as fact that, "...Packages from Rhondas 'UNIQUE TOUCH'! ½ Hour butt hole Massage...Shampoo for 'HERPIES' wash vagina & Elegant Hair Style. Includes Lunch [muf diving]!...'HERPIES'..."

2483. The statement involved a private matter.

2484. Alternatively, the statement involved a public matter.

2485. The statement referred to plaintiff by name and/or indirectly.

2486. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2487. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2488. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2489. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2490. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by innuendo.

2491. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2492. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2493. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2494. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2495. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2496. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2497. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2498. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2499. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2500. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2501. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2034 – Libel Per Se

2502. Defendant's written statement(s) described in Count 2033 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2503. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2035 --Defamation per se

2504. Defendant's written statement(s) described in Count 2033 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2505. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2506. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2507. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2508. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2036-Defamation

ouu

2509. Defendant published a statement by written communication asserting as fact that, "McCarver confessed to their guilt!..."

2510. The statement involved a private matter.

2511. Alternatively, it involved a public matter.

2512. The statement referred to plaintiff by name and/or indirectly.

2513. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2514. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2515. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2516. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2517. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2518. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2519. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2520. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2037– Libel Per Se

2521. Defendant's written statement(s) described in Count 2036 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2522. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2038 - Defamation per se

2523. Defendant's written statement(s) described in Count 2036 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This

type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2524. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2039 – Defamation  
Pablo

2525. Defendant published a statement by written communication asserting as fact that, “Cinco the 'QUEER!'”

2526. The statement involved a private matter.

2527. Alternatively, the statement involved a public matter.

2528. The statement referred to plaintiff indirectly.

2529. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2530. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2531. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2532. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

2533. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2534. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.

2535. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2536. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite



actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2040- Defamation per se

2537. Defendant's written statement(s) described in Count 2039 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

2538. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2041– Libel Per Se

2539. Defendant's written statement(s) described in Count 2039 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2540. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2042-Defamation perverts

2541. Defendant published a statement by written communication asserting as fact that, "...McCarver...deals and takes 'DRUGS'!...Robert McCarver has 'CONFESSED' to Leshers 'DRUGS' 'RAPE' and outhur 'CRIMINAL' activity!..."

2542. The statement involved a private matter.

2543. Alternatively, the statement involved a public matter.

2544. The statement referred to plaintiff by name and/or indirectly.

2545. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2546. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by innuendo.

2547. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2548. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2549. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2550. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2551. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2552. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2553. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2554. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2555. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2556. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2043- Defamation per se

2557. Defendant's written statement(s) described in Count 2042 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2558. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2559. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2560. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2044 – Libel Per Se

2561. Defendant's written statement(s) described in Count 2042 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2562. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2045-2050- Defamation Perverts

2563. Defendant published a statement by written communication asserting as fact that,

a. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

b. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshlers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshler was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

c. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshlers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshler was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

d. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

e. "You Leshler 'PERVERTS' like 'TONGUEING' each outthers 'BUTTS'!"

f. "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..."

2564. The statement involved a private matter.

2565. Alternatively, the statement involved a public matter.
2566. The statement referred to plaintiff by name and/or indirectly.
2567. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
2568. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
2569. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
2570. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
2571. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
2572. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
2573. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
2574. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
2575. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
2576. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
2577. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
2578. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
2579. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
2580. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon,

embarrassment, and ostracization within the community.

2581. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2582. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2051-2056– Libel Per Se

2583. Defendant's written statement(s) described in Count 2045-2051 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2584. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2057-2062- Defamation per se

2585. Defendant's written statement(s) described in Count 2045-2051 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2586. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2587. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2588. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2589. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2063  
Perverts Leshers

2590. Defendant published a statement by written communication asserting as fact that, “If you know anyone that was infected be Robert McCarver, Rhonda[Long]Leshers or Mark Leshers please call your local health department. These are incurable diseases. Call Att. Dan Mehan Clarksville Texas for legal advice!”

2591. The statement involved a private matter.

2592. Alternatively, the statement involved a public matter.

2593. The statement referred to plaintiff by name and/or indirectly.

2594. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2595. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2596. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2597. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2598. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2599. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2600. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2601. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2602. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2603. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshers’ law practice, substantial damage to Rhonda Leshers’ beauty salon, embarrassment, and ostracization within the community.

2604. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2605. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2064- Defamation per se

2606. Defendant's written statement(s) described in Count 2063 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2607. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2608. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2609. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2065 – Libel Per Se

2610. Defendant's written statement(s) described in Count 2063 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2611. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2066-2067 – Defamation Punk maker

2612. Defendant published a statement by written communication asserting as fact that, "...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible

'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!..." (x2)

2613. The statement involved a private matter.

2614. Alternatively, the statement involved a public matter.

2615. The statement referred to plaintiff by name and/or indirectly.

2616. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2617. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2618. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2619. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2620. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2621. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2622. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2623. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2624. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2625. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshler's law practice, substantial damage to Rhonda Leshler's beauty salon, embarrassment, and ostracization within the community.

2626. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2627. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.



Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2068-2069- Defamation per se

2628. Defendant's written statement(s) described in Count 2066-2067 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2629. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2630. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2631. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2070-2071– Libel Per Se

2632. Defendant's written statement(s) described in Count 2066-2067 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2633. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2072 – Defamation ralph

2634. Defendant published a statement by written communication asserting as fact that, "really wish they still hanged criminals of this type. Live in annona and would love to put the rope around these three disgusting perverse creatures neck."

2635. The statement involved a private matter.

2636. Alternatively, the statement involved a public matter.
2637. The statement referred to plaintiff indirectly.
2638. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
2639. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
2640. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
2641. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
2642. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
2643. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
2644. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
2645. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
2646. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
2647. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
2648. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
2649. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2073- Defamation per se

2650. Defendant's written statement(s) described in Count 2072 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2651. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2652. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2653. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2074 - Libel Per Se

2654. Defendant's written statement(s) described in Count 2072 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2655. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2075-2080

Rhonda

2656. Defendant published a statement by written communication asserting as fact that,

a. "...The Lesher and Woods like McCarver are 'PERVERTS' and McCarver has 'CONFESSED' to this and 'DRUGS' he sold for Mark Lesher!..."

b. "...Can you imagine the diseases this 'TRIO OF TRASH' spread? How many more lives will this 'TRIO OF TRASH' destroy?"

c. "Come on by the 'UNIQUE TOUCH' and for your first visit I will 'TONG' your 'BUTT'! My Husband [pinky] Mark Lesher likes to watch! Sometimes Mark and 'ROBERT MCCARVER' give each other a 'BLOW JOB' while I 'TONGUE' their A\*S!..."

d. "...Packages from Rhondas 'UNIQUE TOUCH'!... Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."

e. "HI, I am Rhonda[McCarver]Lesher the one 'RIDING' the Leg! I run the 'UNIQUE TOUCH' in Clarksville Texas! Come on by and get your Free 'BUTT TONGUE' by me on your

first visit! Mark Leshar my 'QUEER' husband will watch for free!”

f. “...Rhonda[McCarver]Leshar gave the Lady an oral 'DOUCHE' 'SUCKING' and 'BITING' her Vagina! Then after playing with their self and each other Mark Leshar and 'ROBERT MCARVER' raped her!...”

2657. The statement involved a private matter.

2658. Alternatively, the statement involved a public matter.

2659. The statement referred to plaintiff by name and/or indirectly.

2660. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2661. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2662. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2663. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2664. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

2665. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

2666. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2667. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2668. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2669. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2670. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2671. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiff of having a loathsome disease by innuendo.

2672. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2673. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2674. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2675. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2676. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2677. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

2678. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2679. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2081-2086- Defamation per se

2680. Defendant's written statement(s) described in Count 2075-2080 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2681. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2682. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2683. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2684. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2685. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2087-2092– Libel per se

2686. Defendant's written statement(s) described in Count 2075-2080 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2687. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

2688. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 2093-2094 -Defamation Rhondas Dogs

2689. Defendant published a statement by written communication asserting as fact that, "...RECORDING BETWEEN Mark Leshar AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshars 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!..." (x2)

2690. The statement involved a private matter.

2691. Alternatively, the statement involved a public matter.

2692. The statement referred to plaintiff by name and/or indirectly.

2693. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2694. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2695. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2696. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2697. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2698. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2699. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2700. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2701. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2702. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2703. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2704. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2095-2096- Defamation per se

2705. Defendant's written statement(s) described in Count 2093-2094 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2706. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2707. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2708. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2097-2098– Libel Per Se

2709. Defendant's written statement(s) described in Count 2093-2094 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2710. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2099-2103

##### Rim Job Rhonda

2711. Defendant published a statement by written communication asserting as fact that,

a. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..." (x4)

b. "Come on by the 'UNIQUE TOUCH' and get a free 'BUTT TONGUE' job by Rhonda[McCarver]Lesher! If you like my 'HERO' pinky Mark Lesher will watch!"

2712. The statement involved a private matter.

2713. Alternatively, the statement involved a public matter.

2714. The statement referred to plaintiff by name and/or indirectly.

2715. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.



2716. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2717. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2718. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2719. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2720. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2721. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2722. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2723. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2724. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2725. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2726. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2727. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2728. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2729. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2730. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs

incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2104-2108– Libel Per Se

2731. Defendant’s written statement(s) described in Count 2099-2103 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2732. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) published his or her respective interpretations of Plaintiff’s natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

2733. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 2109-2113- - Defamation per se

2734. Defendant’s written statement(s) described in Count 2099-2103 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2735. Further, Defendant’s written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2736. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2737. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2738. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2114 – Defamation  
Roy

2739. Defendant published a statement by written communication asserting as fact that, “All know Mike Rice and Mark Leshner, Rhonda also and you are right when you say indictments are coming, more charges on all of you Robert McCarver is a rat and he is and will finish hanging you on drugs, rape, and growing and selling dope. Hope you rot in jail herpies and all.”

2740. The statement involved a private matter.

2741. Alternatively, the statement involved a public matter.

2742. The statement referred to plaintiff by name and/or indirectly.

2743. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2744. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2745. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2746. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2747. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2748. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2749. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

2750. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

2751. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

2752. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

2753. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

2754. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2755. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2756. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2757. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2758. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2115- Defamation per se

2759. Defendant's written statement(s) described in Count 2114 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2760. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2761. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2762. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2763. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2116- Libel Per Se

2764. Defendant's written statement(s) described in Count 2114 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2765. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2117 – Defamation  
rrpoliticks

2766. Defendant published a statement by written communication asserting as fact that, “This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...”

2767. The statement involved a private matter.

2768. Alternatively, the statement involved a public matter.

2769. The statement referred to plaintiff by name and/or indirectly.

2770. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2771. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2772. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2773. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2774. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2775. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2776. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2777. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2778. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2779. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2780. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2781. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2118– Libel Per Se

2782. Defendant's written statement(s) described in Count 2117 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2783. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2119- Defamation per se

2784. Defendant's written statement(s) described in Count 2117 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2785. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2786. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2787. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2220 – Defamation  
Russel

2788. Defendant published a statement by written communication asserting as fact that, “Mrs Brad--\_ was getting her hair fixed by Rhonda...came up with and eye infection...doctor said beautician could have scratched privates with herpies virus and immediately touched her eye...She told sister Rhonda was twitching and scratching alot?”

2789. The statement involved a private matter.

2790. Alternatively, the statement involved a public matter.

2791. The statement referred to plaintiff by name.

2792. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2793. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2794. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2795. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2796. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2797. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2798. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2799. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2800. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2801. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2802. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2803. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2804. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2805. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2806. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2807. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2221- Defamation per se

2808. Defendant's written statement(s) described in Count 2220 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2809. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2810. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2811. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.



2812. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2222– Libel Per Se

2813. Defendant’s written statement(s) described in Count 2220 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2814. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2223-Defamation russel

2815. Defendant published a statement by written communication asserting as fact that, “rhonda always kept my nob polished when I was in town.”

2816. The statement involved a private matter.

2817. Alternatively, the statement involved a public matter.

2818. The statement referred to plaintiff by first name and/or indirectly.

2819. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2820. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2821. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2822. The statement was false because Plaintiff did not engage in said sexual misconduct.

2823. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2824. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon,

embarrassment, and ostracization within the community.

2825. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2826. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2224- Defamation per se

2827. Defendant's written statement(s) described in Count 2223 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2828. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2829. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2830. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2225– Libel Per Se

2831. Defendant's written statement(s) described in Count 2223 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2832. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2226-2227-Defamation sants

2833. Defendant published a statement by written communication asserting as fact that,
- a. “Rhonda[‘SLUT MCCARVER Long]Leshner, is a real draw for Marks business, ‘PERVERTS’ ‘CHILD MOLESTERS’ ‘DOPE HEADS’...”
  - b. “Don’t go [to the Unique Touch]! Rhonda has no mercy with her ‘VIBRATORS’, Watch Mark Leshner walk.”
2834. The statement involved a private matter.
2835. Alternatively, the statement involved a public matter.
2836. The statement referred to plaintiff by name and/or indirectly.
2837. The statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.
2838. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
2839. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
2840. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
2841. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
2842. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
2843. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
2844. The statement was false because Plaintiff has not participated in the conduct alleged by the Defendant.
2845. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
2846. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.
2847. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2848. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2228-2229– Libel Per Se

2849. Defendant's written statement(s) described in Count 2226-2227 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2850. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2230-2231--Defamation per se

2851. Defendant's written statement(s) described in Count 2226-2227 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2852. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2853. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2854. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2855. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2232 – 2234 - Defamation Silver Bullet

2856. Defendant published a statement by written communication asserting as fact that,

a. “Wel watch what I say now Mark Lesner is a lying dope pushin herpes invested piece of shit.If it was up 2 me any crime involving a child would just shoot in the head after they were indicted 2 hell with a trial or letting them live it up in prison. I say ROT in Hell. So go ahead and sue me hell call the rr sheriffs fbi or CSI...”

b. “...As a matter of fact I could name a lot of people...that hasnt been mentioned in here that are selling and making the dope. Not just Robert, Mark, Amy and Ricky there are lots more...”

c. “So What you are saying is that the accuser was willing.. Well what about the 11yr old, Tell me how Rhonda is innocent from that?”

2857. The statement involved a private matter.

2858. Alternatively, the statement involved a public matter.

2859. The statement referred to plaintiff by name and/or indirectly.

2860. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2861. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2862. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2863. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2864. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2865. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2866. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

2867. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

2868. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

2869. The statement was false because Plaintiff does not participate in the type of sexual

misconduct described in Defendant's post.

2870. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

2871. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2872. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2873. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2874. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2875. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2235-2237- Defamation per se

2876. Defendant's written statement(s) described in Count 2232 – 2234 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2877. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2878. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2879. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2880. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2238-2240– Libel per se

2881. Defendant’s written statement(s) described in Count 2232 – 2234 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2882. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

2883. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2241-2242-Defamation  
skank

2884. Defendant published a statement by written communication asserting as fact that,

- a. “...Packages from Rhondas 'UNIQUE TOUCH'! ½ Hour butt hole Massage...Shampoo for 'HERPIES' wash vagina & Elegant Hair Style. Includes Lunch [muf diving]!...'HERPIES'...”
- b. “...!SCUMB'!...outher evidence against this 'TRIO OF TRASH', infested with diseases...”

2885. The statement involved a private matter.

2886. Alternatively, the statement involved a public matter.

2887. The statement referred to plaintiff by name and/or indirectly.

2888. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2889. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2890. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2891. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2892. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2893. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2894. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2895. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2896. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

2897. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2898. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2899. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

2900. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2901. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2902. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2903. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2243-2244--Defamation per se



2904. Defendant's written statement(s) described in Count 2241-2242 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2905. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2906. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2907. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2908. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2245-2246– Libel Per Se

2909. Defendant's written statement(s) described in Count 2241-2242 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2910. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2247-2248 -Defamation

slimmmeeee

2911. Defendant published a statement by written communication asserting as fact that, "Wonder if this Fello knows about 'THE TRIO OF TRASH' past history? Could he be another 'VICTOM'?This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!" (x2)

2912. The statement involved a private matter.

2913. Alternatively, the statement involved a public matter.

2914. The statement referred to plaintiff by name and/or indirectly.

2915. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2916. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2917. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2918. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2919. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2920. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2921. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2922. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2923. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2924. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2925. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2926. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 2249-2250– Libel Per Se

2927. Defendant’s written statement(s) described in Count 2247-2248 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2928. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2251-2252- Defamation per se

2929. Defendant’s written statement(s) described in Count 2247-2248 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2930. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2931. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2932. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2253-2255-Defamation

Slut Rhonda Leshar

2933. Defendant published a statement by written communication asserting as fact that,

a. “...How could that woman know I sucked and bit her vagina, then Mark and McCarver raped her? My ['HERO'] Mark Leshar gave her an oral douche, and sucked out the evidence!!!!!!!!!!!!”

b. “Mark['PERVERT'] Leshar is at the bar above the Unique Touch right now with two Black Men! 'DRUNK!'”

c. “If you or you know anyone that has been infected with 'AIDS' , 'HERPIES' By Rhonda[Long]Leshar, Robert McCarver or Mark Leshar please call you r local health department...”

2934. The statement involved a private matter.

2935. Alternatively, the statement involved a public matter.

2936. The statement referred to plaintiff by name and/or indirectly.

2937. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2938. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2939. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2940. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

2941. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2942. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2943. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

2944. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

2945. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

2946. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

2947. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

2948. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

2949. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2950. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

2951. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2952. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2256-2258- Defamation per se

2953. Defendant's written statement(s) described in Count 2253-2255 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2954. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2955. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2956. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2957. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2259-2261– Libel Per Se

2958. Defendant's written statement(s) described in Count 2253-2255 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2959. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2262-2274-Defamation  
Smiley

2960. Defendant published a statement by written communication asserting as fact that,

- a. “These Mr Mark and Rhonda Leshner people believe the way Mr Robert McCarver does, if we raise and feed these kids we are sure going to molest them...”
- b. “...we all know the leshners are never victims but are always trying to rape something or in this someone...”
- c. “...While leshners had Shannon hooked on drugs; leshner had Shannon change her will...”
- d. “...she [Shannon] was at mark leshners hetting raped and molested by rhonda who was performing oral sex on her...”
- e. “after they raped and molested her I heard mike rice have her an oral douche before she could get away. Thats his job, the clean up man.
- f. “...In other words, if Leshner raped her she deserved it! Ronda had a right to perform oral sex on her. So what if they drugged her!...Is this RRC way of thinking ? I don't think so.”
- g. “...I guess when the Leshners go to jail your orgie parties will stop. Who will you get your drugs from?”
- h. “...Rhonda has a friend in Dallas that is a 'transvestite' Yes this is a fact...This is how sick the Leshners are...Its first name is Wynona, but will try to have its last name and address and I will post. Leshners are guilty of rape and think they are above the law and its funny...'TRANVESTITES' 'RAPIST' < 'CHILD MOLESTERS', 'DRUGS ', 'THEIVES', perverts of all kinds, dumps, liquor, greed, these are the most lying perverted bunch I have ever heard of.”
- i. “[Linda Velvin was] mark leshners common law wife that took a wrap for him. He repaid her by kicking her out and let her go to Jail. Mike Rice was her brother and he helped leshner set her up and get rid of her...Lindas son conviently killed his self after lasher got through with him. State Police still trying to get Leshner for that and drugs. Linda was talking before she conviently died??? This slimy bunch mark leshner, ronda leshner, mike rice, and robbery mmcarver are perverts of the worst kind...all I have said is TRUE and are FACTS.”
- j. “...Greed and intimidation is all he cares about and pervision.”
- k. “Robert Mc Carver was living with mark and rhonda leshner when the rape occured, leshner was his bondsman and knew he was a child molester, thier, dope head, and sex pervert that is why leshners keef him around, perverts of the worst kind.”
- l. “Wonder if they give you valtrex in prison or just let you rot away?”
- m. “...Mark Leshner...wants to grow weed, sells weed, sells dope, sex orgies at his bar and spreads herpies, drug and rape women while Ronda gives oral sex while they watch, ...gets kick backs on projects like mail street, ...buys Rhonda strippers to have oral sex with and spread diseases...'ANTICHRIST'.”

2961. The statement involved a private matter.

2962. Alternatively, the statement involved a public matter.

2963. The statement referred to plaintiff by name and/or indirectly.

2964. The statement was defamatory because it unambiguously accused the Plaintiff of sexual

misconduct.

2965. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2966. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

2967. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

2968. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

2969. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

2970. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

2971. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

2972. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

2973. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

2974. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

2975. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

2976. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

2977. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

2978. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

2979. Additionally and/or alternatively, the statement was false because Plaintiff did not engage

in conduct injuring his and/or her occupation.

2980. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

2981. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon, embarrassment, and ostracization within the community.

2982. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

2983. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2275-2288- Defamation per se

2984. Defendant's written statement(s) described in Count 2262-2274 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

2985. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

2986. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

2987. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

2988. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

2989. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.



Counts 2239-2301– Libel per se

2990. Defendant’s written statement(s) described in Count 2262-2274 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

2991. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

2992. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2302-2304-Defamation  
Smiley friend

2993. Defendant published a statement by written communication asserting as fact that,

- a. “These people molest a mans child and wife and have the gall to brag about it and the dead...”
- b. “...pervision and greed is all they know...”

2994. The statement involved a private matter.

2995. Alternatively, the statement involved a public matter.

2996. The statement referred to plaintiff indirectly.

2997. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

2998. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

2999. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3000. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3001. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3002. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3003. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3004. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3005. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3006. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3007. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3008. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2305-2306– Libel Per Se

3009. Defendant's written statement(s) described in Count 2303-2304 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3010. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2307-2308- Defamation per se

3011. Defendant's written statement(s) described in Count 2303-2304 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3012. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3013. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3014. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2309-2310

#### Starla Witch

3015. Defendant published a statement by written communication asserting as fact that, "...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!..." (x2)

3016. The statement involved a private matter.

3017. Alternatively, the statement involved a public matter.

3018. The statement referred to plaintiff indirectly.

3019. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3020. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3021. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3022. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3023. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3024. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3025. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3026. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3027. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3028. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3029. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3030. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2311-2312- Defamation per se

3031. Defendant's written statement(s) described in Count 2309-2310 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3032. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3033. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3034. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2313-2314- Libel per se

3035. Defendant's written statement(s) described in Count 2309-2310 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s)

injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3036. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3037. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2315-2327

Suzan

3038. Defendant published a statement by written communication asserting as fact that,

- a. "...Rhonda lesher gave her 'HERPIES'..."
- b. "Why are you so concerned about the little girls name posted, but not the little boy D.J.who was a victom of Mark Lesher..."
- c. "Why was a know criminal living with the Leshers? Why did Mark Lesher not call Jerry? Mark knew him and mooched off him for years...Leshers and McCarvers went to Jail not the victom...*indited*...I hope all their paid and morless supporters ar there when they go to Jail."
- d. "...'WHY DON'T YOU LESHER PERVERTS SCREAM ABOUT THE VICTOM D.J. COYEL, OR SHANNON COYELS NAME POSTED?...Mark Lesher and his Perverted Oral sex 'HERPIES' wife Rhonda Lesher. What is this slut had give the victom 'HERPIES'."
- e. "If you know anyone with information about Rhonda or Mark Leshers anomally sex activity please call D.A. Val Varley 400 N. Walnut Clarksville Texas 75426!!!!!!!!!!!!!"
- f. "...'GREED' and 'PERVISION'"
- g. "You 'FOOL' the GJ are moral people that know these perverts and their history of pervision..."
- h. Poster copies and pastes some of his/her previous posts and adds onto them--"LOOK HOW MANY TIMES LESHERS PERVERTS HAVE TRIED TO GET THIS REMOVED!#####" (x4)
- i. "Rhonda said {Quote} The Black people on welfare, and are not her peers..."
- j. "...Rhonda...is telling all that will listen to her,anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her,because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHER...thier...several had witnesses the fight between her and Mark over ROBERT McCarver."

3039. The statement involved a private matter.

3040. Alternatively, the statement involved a public matter.

3041. The statement referred to plaintiff by name and/or indirectly.
3042. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3043. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3044. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3045. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
3046. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
3047. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
3048. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.
3049. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.
3050. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.
3051. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3052. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.
3053. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
3054. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3055. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.
3056. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3057. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2328-2340– Libel per se

3058. Defendant's written statement(s) described in Count 2315-2327 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3059. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3060. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2341-2353- Defamation per se

3061. Defendant's written statement(s) described in Count 2315-2327 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3062. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3063. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3064. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3065. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2354 - Defamation  
The Reason

3066. Defendant published a statement by written communication asserting as fact that, "...But for some even greater news they will be rearrested soo for many other suits filed against them. So to the Leshers " You are not above the LAW" in rrcounty like you thought you were..."

3067. The statement involved a private matter.

3068. Alternatively, it involved a public matter.

3069. The statement referred to plaintiff by name and/or indirectly.

3070. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

3071. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3072. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3073. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3074. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3075. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshes's law practice, substantial damage to Rhonda Leshes's beauty salon, embarrassment, and ostracization within the community.

3076. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3077. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants



acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2355– Libel Per Se

3078. Defendant’s written statement(s) described in Count 2354 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3079. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2356- Defamation per se

3080. Defendant’s written statement(s) described in Count 2354 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3081. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2357

#### THE WHOLE TRUTH

3082. Defendant published a statement by written communication asserting as fact that, “My name is Shannon Coyel and...I am the lady that MARK Lescher and Rhonda Long did these awful and disgusting things to...”

3083. The statement involved a private matter.

3084. Alternatively, the statement involved a public matter.

3085. The statement referred to plaintiff by name.

3086. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3087. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of sexual misconduct by innuendo.

3088. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3089. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3090. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3091. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3092. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3093. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3094. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3095. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3096. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3097. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2358– Libel Per Se

3098. Defendant's written statement(s) described in Count 2357 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured

Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3099. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2359 - Defamation per se

3100. Defendant's written statement(s) described in Count 2357 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3101. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3102. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3103. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2360 -2362 -Defamation them

3104. Defendant published a statement by written communication asserting as fact that,

a. "When these Women found out Mark Leshar was 'QUEER' they divirced him! Rhondas 'BUTT TONGUE' keeps Leshar happy..."

b. "AFTER THESE WOMEN FOUND OUT LESHER WAS 'QUEER' THEY DIVORCED HIM!... Mark Leshar the 'ANTICHRIST' has had the F.B.I. After him but just could not get a break... 'PERVISION'... moroless..." (x2)

3105. The statement involved a private matter.

3106. Alternatively, the statement involved a public matter.

3107. The statement referred to plaintiff by name and/or indirectly.

3108. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3109. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3110. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3111. The statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3112. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3113. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3114. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3115. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3116. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3117. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3118. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2363-2365– Libel Per Se

3119. Defendant's written statement(s) described in Count 2360 -2362 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3120. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2366-2367- Defamation per se

3121. Defendant's written statement(s) described in Count 2360 -2362 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3122. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2368

Toby

3123. Defendant published a statement by written communication asserting as fact that, "LESBIAN', Rhonda[McCarver]Leshar serving drinks at her 'ORGIE BAR'! Wonder if this fello knows she was indicted with 'ROBERT MCCARVER' and Mark Leshar for 'DRUGGING' a woman then trying to Give her an 'PRAL DOUCHE'[sucked her vagina raw] then McCarver and Leshar 'RAPED' the victom. Wonder what his 'FATE' will be?"

3124. The statement involved a private matter.

3125. Alternatively, the statement involved a public matter.

3126. The statement referred to plaintiff by name and/or indirectly.

3127. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3128. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3129. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3130. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3131. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3132. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshar's law practice, substantial damage to Rhonda Leshar's beauty salon,

embarrassment, and ostracization within the community.

3133. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3134. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2369- Defamation per se

3135. Defendant's written statement(s) described in Count 2368 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3136. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2370 – Libel Per Se

3137. Defendant's written statement(s) described in Count 2368 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3138. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2371-2372 -Defamation toliver

3139. Defendant published a statement by written communication asserting as fact that,
- a. "...LINDA VELVIN' was Mark Leshers common Law Wife, Lesher let her take the rap then moved Rhonda[long]Lesher in...Linda Velvin was Mark Leshers last fall guy...Mark Lesher the 'ANTICHRIST' has had the F.B.I. after him...scumbs...'PERVISION'...moreless..."
  - b. "...just 'FACTS' from the crime they comitted, 'DRUGS', 'RAPE', 'PERVISION!' Mo re charges to come!..."
3140. The statement involved a private matter.
3141. Alternatively, the statement involved a public matter.
3142. The statement referred to plaintiff by name and/or indirectly.
3143. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3144. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3145. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3146. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3147. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3148. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.
3149. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3150. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2373-2374– Libel per se

3151. Defendant’s written statement(s) described in Count 2371-2372 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3152. Further, Defendant’s written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) impeached Plaintiff’s honesty, integrity, virtue, and/or reputation.

3153. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2375-2376- Defamation per se

3154. Defendant’s written statement(s) described in Count 2371-2372 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3155. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3156. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3157. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2377 – Defamation

Tongue it

3158. Defendant published a statement by written communication asserting as fact that, “‘QUEER’ is what Leshar is!”

3159. The statement involved a private matter.

3160. Alternatively, the statement involved a public matter.

3161. The statement referred to plaintiff by name.

3162. The statement was defamatory because it unambiguously accused the Plaintiff of sexual



misconduct.

3163. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3164. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3165. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3166. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3167. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3168. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3169. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2378- Defamation per se

3170. Defendant's written statement(s) described in Count 2377 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3171. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2379- Libel Per Se

3172. Defendant's written statement(s) described in Count 2377 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3173. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2380-Defamation

##### Trash

3174. Defendant published a statement by written communication asserting as fact that, "I know Mark and Ronda personally...They have orgies...they are very very sick people..."

3175. The statement involved a private matter.

3176. Alternatively, the statement involved a public matter.

3177. The statement referred to plaintiff by name and/or indirectly.

3178. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3179. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3180. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3181. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3182. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3183. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3184. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3185. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2381– Libel Per Se

3186. Defendant’s written statement(s) described in Count 2380 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3187. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2382- Defamation per se

3188. Defendant’s written statement(s) described in Count 2380 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3189. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2383-2384-Defamation trio of trash

3190. Defendant published a statement by written communication asserting as fact that,

a. “...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'!...”

b. “...morolless...Only a perverted piece os 'SH\*I like Lesher would do such. The 'FAT LADY' ain't near through singing yet!...outhers have a copy of this letter.”

3191. The statement involved a private matter.

3192. Alternatively, the statement involved a public matter.

3193. The statement referred to plaintiff by name and/or indirectly.
3194. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3195. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3196. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3197. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
3198. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
3199. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
3200. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3201. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
3202. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3203. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
3204. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3205. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2385-2386- Defamation per se

3206. Defendant's written statement(s) described in Count 2383-2384 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3207. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3208. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3209. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2387-2388– Libel Per Se

3210. Defendant's written statement(s) described in Count 2383-2384 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3211. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2389-2390-Defamation

##### TRIO of TRASH

3212. Defendant published a statement by written communication asserting as fact that,  
a. "This 'SCUMB' is going to Jail anyway!...DO you swing with this 'TRIO OF TRASH'? Get 'DRUGS' from them?"  
b. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

3213. The statement involved a private matter.

3214. Alternatively, the statement involved a public matter.

3215. The statement referred to plaintiff by name and/or indirectly.
3216. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3217. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3218. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3219. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
3220. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
3221. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
3222. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3223. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
3224. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3225. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.
3226. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3227. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2391-2392– Libel Per Se

3228. Defendant’s written statement(s) described in Count 2389-2390 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3229. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2393-2394- Defamation per se

3230. Defendant’s written statement(s) described in Count 2389-2390 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3231. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3232. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3233. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2395-Defamation  
Trouble

3234. Defendant published a statement by written communication asserting as fact that,  
a. “...have been at mark and ronda leshers unique touch in clarksville sucking spearm marks sick and has to have stomach pumped too much spearm hope he son't have “AIDS' like ronda yet”

3235. The statement involved a private matter.

3236. Alternatively, the statement involved a public matter.

3237. The statement referred to plaintiff by name.

3238. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

3239. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3240. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3241. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3242. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3243. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3244. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

3245. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3246. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3247. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3248. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

3249. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

3250. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3251. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3252. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3253. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs



incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2396--Defamation per se

3254. Defendant's written statement(s) described in Count 2395 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3255. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3256. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

3257. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3258. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2397-- Libel Per Se

3259. Defendant's written statement(s) described in Count 2395 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3260. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2396-Defamation

##### Truth

3261. Defendant published a statement by written communication asserting as fact that, "LOOK HOW MANY TIMES LESHERS PERVERTS HAVE TRIED TO GET THIS REMOVED!#####"

3262. The statement involved a private matter.
3263. Alternatively, the statement involved a public matter.
3264. The statement referred to plaintiff by name.
3265. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3266. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3267. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3268. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3269. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3270. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
3271. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3272. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2397– Libel Per Se

3273. Defendant's written statement(s) described in Count 2396 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3274. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2398- Defamation per se

3275. Defendant's written statement(s) described in Count 2396 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3276. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2399-2406-Defamation  
truth

3277. Defendant published a statement by written communication asserting as fact that,

a. "...'KARMA IS A BITCH' especially when 'PERVERTS' molest the wrong mans family!"

b. "...The F.B.I. want Mark Leshar for several outhar crimes...Mark Leshar gave Jerry Coyel drugs when he was working out at race for life before his back surgery, Human Groth Hormone, Testitrone, Pills, Viagra, deca...Jerry Coyel gave the F.B.I. These ileagal drugs mark had gave him to sample...I have waited for months for the F.B.I. To finally take Leshar down...This is just a sample of what Leshar is facing. The rrcounty Sheriff Iffice has these records."

c. "...Rhonda[Long]Leshar, known to be a bysexual and perverted! Robert Lynn McCarver, known criminal, child molester, thief, dope head, dope dealer,...Mark Leshar...known pervert, drug dealer, known drunk...This 'TRIO OF TRASH' live together...Rhonda lied [in court]...This is all Court Record...This 'TRIO OF TRASH' will go to Jail. There is a lot more evidence you will hear in court."

d. "...Rhonda and Mark Leshar has 'HERPIES' and 'AIDS' but are taking medicine."

e. -- "If you know anyone that was infected be Robert McCarver, Rhonda[Long]Leshar or Mark Leshar please call your local health department.These are incruable diseases. Call Att. Dan Mehan Clarksville Texas for legal advice!"

f. "...Rhonda...is telling all that will listen to her,anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her,because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHER...thier...several had witnesses the fight between her and Mark over ROBERT McCarver."

g. "...Mark gives him [Robert McCarver] money and drugs..."

h. “NEWS FLASH’---Rhonda[Long]Lesh er is telling the Rotary Club, This is it, no more chanches! [We] want to teach a class on 'RAPE', 'CHILD MOLESTING' 'DRUGS', 'ORGIES', 'HERPIES', 'AIDS', and 'DYNAMITE'...'THE TRIO OF TRASH'!!!”

3278. The statement involved a private matter.

3279. Alternatively, the statement involved a public matter.

3280. The statement referred to plaintiff by name and/or indirectly.

3281. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

3282. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3283. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3284. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3285. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3286. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3287. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

3288. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3289. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3290. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3291. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

3292. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

3293. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3294. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3295. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3296. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2407-2414- Defamation per se

3297. Defendant's written statement(s) described in Count 2399-2406 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3298. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3299. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3300. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3301. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2415-2422- Libel per se

3302. Defendant's written statement(s) described in Count 2399-2406 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s)

injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3303. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3304. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2423 – Defamation  
TRUTHFULLY

3305. Defendant published a statement by written communication asserting as fact that, "OKAY, SO RHONDA HAS ALWAYS LIKED WOMEN... DON;T YALL REMEMBER THE DIRTY PHOTOS OF HER AND BURRELL HARVEY'S EX, MARYANN THAT SHE BRAGGED AND SHOWED OFF ALL OVER THE UNIQUE TOUCH YEARS BACK?????..."

3306. The statement involved a private matter.

3307. Alternatively, the statement involved a public matter.

3308. The statement referred to plaintiff by name and/or indirectly.

3309. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3310. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3311. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3312. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3313. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3314. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3315. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3316. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2424– Libel Per Se

3317. Defendant's written statement(s) described in Count 2423 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3318. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2425 - Defamation per se

3319. Defendant's written statement(s) described in Count 2423 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3320. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2426-Defamation u know

3321. Defendant published a statement by written communication asserting as fact that, "Health department, needs to make them [*n.b. The Leshers*] take a blood test."

3322. The statement involved a private matter.

3323. Alternatively, the statement involved a public matter.

3324. The statement referred to plaintiff by name and/or indirectly.

3325. The statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3326. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3327. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3328. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3329. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3330. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3331. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2427– Libel Per Se

3332. Defendant's written statement(s) described in Count 2426 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3333. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.



Count 2428 -Defamation

U nu

3334. Defendant published a statement by written communication asserting as fact that, "...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!..."

3335. The statement involved a private matter.

3336. Alternatively, the statement involved a public matter.

3337. The statement referred to plaintiff by name and/or indirectly.

3338. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3339. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3340. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3341. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3342. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3343. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3344. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3345. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3346. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3347. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3348. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3349. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2429– Libel per se

3350. Defendant's written statement(s) described in Count 2428 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3351. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3352. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2430 - Defamation per se

3353. Defendant's written statement(s) described in Count 2428 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3354. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3355. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3356. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2431-2433-Defamation- umm

3357. Defendant published a statement by written communication asserting as fact that,

a. “Yall are a bunch of puss—s, We are scared to death 'FOOL' aint it about time to molest your kids?”

b. “Ment, Ain't it time for you to 'MOLEST' our kids, 'PERVERT'!!!!!!!!!!”

c. “Dan Meehand knows the Leshers and hates them, he will sue for Shannon with help from outhers soon! Why don't you have the Leshers take a 'BLOOD TEST' and publish the results, from a repitable hospital.”

3358. The statement involved a private matter.

3359. Alternatively, the statement involved a public matter.

3360. The statement referred to plaintiff by name and/or indirectly.

3361. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3362. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3363. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3364. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3365. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3366. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

3367. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

3368. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3369. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

3370. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3371. Defendant is strictly liable because his allegation concerns a private issue and a private

Plaintiff.

3372. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3373. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3374. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2434-2436- Defamation per se

3375. Defendant's written statement(s) described in Count 2431-2433 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3376. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3377. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3378. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3379. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2437-2439– Libel Per Se

3380. Defendant's written statement(s) described in Count 2431-2433 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3381. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2440-2444-Defamation  
uol

3382. Defendant published a statement by written communication asserting as fact that,

a. “Rhonda Leshler 'THREATENS' Rotary Club!...”

b. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshler! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were impounded for 'HERPIES'! This is one sick 'SLUT'!...”  
(x4)

3383. The statement involved a private matter.

3384. Alternatively, the statement involved a public matter.

3385. The statement referred to plaintiff by name and/or indirectly.

3386. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

3387. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3388. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3389. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3390. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3391. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3392. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3393. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

3394. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3395. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3396. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3397. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2445-2449– Libel Per Se

3398. Defendant's written statement(s) described in Count 2440-2444 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3399. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2450-2454- Defamation per se

3400. Defendant's written statement(s) described in Count 2440-2444 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3401. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3402. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3403. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2455-Defamation

uuTHEM

3404. Defendant published a statement by written communication asserting as fact that, "...McCarver confessed to their guilt!.."

3405. The statement involved a private matter.

3406. Alternatively, it involved a public matter.

3407. The statement referred to plaintiff indirectly.

3408. The statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3409. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3410. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3411. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3412. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3413. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3414. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2456– Libel Per Se

3415. Defendant’s written statement(s) described in Count 2455 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3416. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2457- Defamation per se

3417. Defendant’s written statement(s) described in Count 2455 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3418. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2458 – Defamation Victims watch out

3419. Defendant published a statement by written communication asserting as fact that, “...Indictment was raised to Agg. Sexual Assault because of McCarvers 'CONFESSION' and outhere evidence! Did you take your 'VALTREX' today?”

3420. The statement involved a private matter.

3421. Alternatively, the statement involved a public matter.

3422. The statement referred to plaintiff indirectly.

3423. The statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3424. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3425. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.



3426. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

3427. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

3428. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3429. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3430. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3431. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3432. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2459– Libel Per Se

3433. Defendant's written statement(s) described in Count 2458 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3434. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2460 - Defamation per se

3435. Defendant's written statement(s) described in Count 2458 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3436. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely accused Plaintiff of committing a crime.

3437. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3438. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2461-2462-Defamation

##### Wanda

3439. Defendant published a statement by written communication asserting as fact that

a. "The trio would by now know their goose is cooked...ilbedipt and lou have always told the truth, and what they have posted came true. After the second trial and arrest the trio must be guilty..."

b. "...Their will be a trial, and when the truth is told, and this trios past history is exposed, they will be convicted."

3440. The statement involved a private matter.

3441. Alternatively, it involved a public matter.

3442. The statement referred to plaintiff by name and/or indirectly.

3443. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

3444. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3445. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3446. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3447. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3448. Defendant's false statement caused injury to plaintiff, including substantial damage to

Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3449. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3450. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2463-2464– Libel Per Se

3451. Defendant's written statement(s) described in Count 2461-2462 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3452. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2465-2466- Defamation per se

3453. Defendant's written statement(s) described in Count 2461-2462 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3454. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2467-2474-Defamation Watch Dog

3455. Defendant published a statement by written communication asserting as fact that,

- a. “Wonder what outhor 'DISEASES' they have?”
- b. “...Leshar is trying to keep all his 'DRUG' salesmen close!...”
- c. “That is true, Leshers had Shannon captured and hidden for two weeks while giving her 'DRUGS' as testified to in Court by Rhonda and McCarver! While being 'DRUGGED' Rhonda gave her an 'ORAL DOUCHE' by 'BITING' and 'SUCKING' on her vagina. Mark Leshar and 'ROBERT MCCARVER' were playing with their selves and each outhor then 'RAPED' Shannon. McCarver has 'CONFESSED' this to the DA and Sheriff before Leshar paid \$20,000.00 bond to stop him from talking!”
- d. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshar! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”
- e. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshar! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”
- f. “...Rhonda Leshar 'THREATENS' Rotary Club! Rhonda [McCarver Long]Leshar tells Rotary club members, Me 'ROBERT MCCARVER', and Mark wants to teach a class on how to 'DRUG' and 'RAPE' a 'VICTOM' 'DRUGS' 'RAPE' 'CHILD MOLESTING' 'ORAL SEX' 'ORGIES' 'HERPIES' and 'DYNAMITE' we have vast 'EXPERIENCE' on!...”
- g. “...she wanted to leave her husband because he is 'QUEER'... She now has spread 'HERPIES', possible 'AIDS' she says she got from Mark Leshar! Rhonda, Sharla and Bill Woods had several 'ORGIES', Her 'DOGS' were inpounded for 'HERPIES'! This is one sick 'SLUT'!...”
- h. “...Rhonda Leshar 'THREATENS' Rotary Club! Rhonda [McCarver Long]Leshar tells Rotary club members, Me 'ROBERT MCCARVER', and Mark wants to teach a class on how to 'DRUG' and 'RAPE' a 'VICTOM' 'DRUGS' 'RAPE' 'CHILD MOLESTING' 'ORAL SEX' 'ORGIES' 'HERPIES' and 'DYNAMITE' we have vast 'EXPERIENCE' on!...”

3456. The statement involved a private matter.

3457. Alternatively, the statement involved a public matter.

3458. The statement referred to plaintiff by name and/or indirectly.

3459. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3460. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3461. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3462. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3463. Additionally and/or alternatively, the statement was defamatory because it accused the

Plaintiffs of committing a crime by innuendo.

3464. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3465. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

3466. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

3467. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

3468. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3469. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

3470. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3471. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3472. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3473. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3474. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2475-2482– Libel Per Se

3475. Defendant's written statement(s) described in Count 2465-2466 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3476. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2483-2490- Defamation per se

3477. Defendant's written statement(s) described in Count 2465-2466 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3478. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3479. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3480. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3481. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2491-2496-Defamation

##### Watching

3482. Defendant published a statement by written communication asserting as fact that,

a. "...Rhonda could 'TONGUE' McCaver! Leshner could watch, and do each other. They could keep McCarver from 'CONFESSING' more! Now the Leshners even have Stacy Coleman a Black man to do them! Leshners and their 'LOVERS'!..."

b. "...Rhonda...is telling all that will listen to her, anymore, That the GRAND JURY was not made up of HER peers as required by law. She said that because there were BLACK PEOPLE on the jury is was not fair to her, because she is not black and that only white people are her peers...'There is no way I can be treated fairly by black people ,for I am not black and because they all do not like white people with money,' quote by RHONDA LESHNER...Rhonda Leshner now has insulted the Grand Jury...Rhonda must think its 'GREAT' to 'TONGUE' and have 'SEX' with Black people like Stacy Coleman, just not her Juriors!"

c. "Thats exactly what Rhonda said hen Stacy Coleman was making out with her! Rhonda told Stacy, I 'LOVE' dark meat! Rhonda said you will like my 'TONGUE'! I really don't think Rhonda was going to run of with Red, she just wanted to 'TONGUE' him and his friends!!!"

d. "...this thread is about 'THE TRIO OF TRASH' three 'PERVERTS' that 'RAPED' a helpless woman!..."

- e. “...Rhonda Lesher 'THREATENS' Rotary Club! Rhonda [McCarver Long]Lesher tells Rotary club members, Me 'ROBERT MCCARVER', and Mark wants to teach a class on how to 'DRUG' and 'RAPE' a 'VICTOM' 'DRUGS' 'RAPE' 'CHILD MOLESTING' 'ORAL SEX' 'ORGIES' 'HERPIES' and 'DYNAMITE' we have vast 'EXPERIENCE' on!...”
- f. “‘ROBERT MCCARVER' and the 'TONGUER' Rhonda! Hahhaha”

3483. The statement involved a private matter.

3484. Alternatively, the statement involved a public matter.

3485. The statement referred to plaintiff by name and/or indirectly.

3486. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3487. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3488. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3489. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3490. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3491. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3492. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of having a loathsome disease.

3493. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by innuendo.

3494. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of having a loathsome disease by implication.

3495. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

3496. Additionally and/or alternatively, the statement was false because Plaintiff does not have said loathsome disease.

3497. Additionally and/or alternatively, the statement was false because Plaintiff did not

commit said crime.

3498. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3499. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3500. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3501. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2497-2502- Defamation per se

3502. Defendant's written statement(s) described in Count 2491-2496 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3503. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3504. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3505. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3506. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2503-2508- Libel Per Se



3507. Defendant's written statement(s) described in Count 2491-2496 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3508. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2509-2514-Defamation  
well well well

3509. Defendant published a statement by written communication asserting as fact that,

a. "...'ROBERT MCCARVER' infested with 'HERPIES' and 'AIDS' and type 'C' from drug needles and 'ORGIES'! Rember when you go to the 'UNIQUE TOUCH' you do at your own risk, they already have been infected!"

b. "...RECORDING BETWEEN Mark Leshner AND his 'LOVER' Robert McCarver RECORD: Robert I am at the house. Rhonda is not here at this very second. I have come back. Got my foot in the door...So I can get my dogs before Rhonda screws them to death and get out of here...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'...victom...A 'ROPE' is what McCarver needs, not an Attorney!..."

c. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!..."

d. "...These are the 'SLIMEST' 'LYING' 'PERVERTED' 'CHILD MOLESTING' 'HELPLESS WOMAN RAPING' 'SCUM' I have ever heard of!..." (x3)

3510. The statement involved a private matter.

3511. Alternatively, the statement involved a public matter.

3512. The statement referred to plaintiff by name and/or indirectly.

3513. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3514. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3515. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3516. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional

occupation.

3517. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3518. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3519. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

3520. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3521. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3522. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3523. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

3524. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

3525. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3526. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3527. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3528. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Counts 2515-2520- Defamation per se

3529. Defendant's written statement(s) described in Count 2509-2514 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3530. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

3531. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3532. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3533. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2521-2526- Libel per se

3534. Defendant's written statement(s) described in Count 2509-2514 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3535. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) impeached Plaintiff's honesty, integrity, virtue, and/or reputation.

3536. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2527-Defamation  
what wrong

3537. Defendant published a statement by written communication asserting as fact that, "The leshers raping and drugging any person is very wrong. Thats what is WRONG!!!!"

3538. The statement involved a private matter.

3539. Alternatively, the statement involved a public matter.

3540. The statement referred to plaintiff by name and/or indirectly.
3541. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3542. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3543. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3544. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
3545. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
3546. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
3547. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3548. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
3549. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3550. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.
3551. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3552. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 2528– Libel Per Se

3553. Defendant’s written statement(s) described in Count 2527 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3554. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2529 - Defamation per se

3555. Defendant’s written statement(s) described in Count 2527 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3556. Further, Defendant’s statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3557. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3558. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2530 – 2532-Defamation

Worthit

3559. Defendant published a statement by written communication asserting as fact that,

a. “Hey Rhonda Long Leshner was getting in with Bill and Sharla worth all this??...did you really think she [Shannon Coyel] would keep her mouth shut when YOU LIED and tried to help Bill a known child raper/beater try and take her kids...Hope you don't end up like al of Mark's XXXXXXXXXXX's???!!!!!!...”

b. “So Mark or I mean Pinky how does it feel to have your little pinky fate in the hands of 12 jurors...and then think you, Rhonda and Robert could rape her and her not tell...”

c. “...WOW does Mark make this much money selling his drugs that he can afford someone like this Robert guy who is bleeding Mark's pocket...”

3560. The statement involved a private matter.

3561. Alternatively, the statement involved a public matter.

3562. The statement referred to plaintiff by name and/or indirectly.
3563. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3564. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3565. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3566. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.
3567. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.
3568. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.
3569. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.
3570. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.
3571. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3572. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.
3573. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.
3574. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants

acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2533-2535- Defamation per se

3575. Defendant's written statement(s) described in Count 2530-2532 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3576. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3577. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3578. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2536-2538 – Libel per se

3579. Defendant's written statement(s) described in Count 2530-2532 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3580. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

3581. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

#### Counts 2539-2541-Defamation

wou

3582. Defendant published a statement by written communication asserting as fact that,

a. "Next time 'MARK[pinky]Leshner use a sharp knife when you try and stab one in the back, 'MORON'!!!!"

b. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Leshner

was sucking and biting the victims vagina, giving her an oral 'DOUCHE'...A 'ROPE' is what McCarver needs, not an Attorney!...””

c. “Normal activities you mean 'ORGIES' 'DRUNKS' 'PERVERTS' 'RAPE' 'DRUGS' I say 'DRUGS'...”

3583. The statement involved a private matter.

3584. Alternatively, the statement involved a public matter.

3585. The statement referred to plaintiff by name and/or indirectly.

3586. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3587. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3588. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3589. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiffs of a crime.

3590. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3591. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3592. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

3593. Additionally and/or alternatively, the statement was false because Plaintiff did not commit said crime.

3594. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3595. Defendant’s false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner’s law practice, substantial damage to Rhonda Leshner’s beauty salon, embarrassment, and ostracization within the community.

3596. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3597. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a).



More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2542-2544- Defamation per se

3598. Defendant's written statement(s) described in Count 2539-2541 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3599. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3600. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3601. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2545-2547- Libel per se

3602. Defendant's written statement(s) described in Count 2539-2541 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3603. Further, Defendant's written statement(s) was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) published his or her respective interpretations of Plaintiff's natural defects, thereby exposing him to public hatred, ridicule, and/or financial injury.

3604. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff

Count 2548 – Defamation  
Wounded

3605. Defendant published a statement by written communication asserting as fact that, “...Either way you aren't going to sway my opinion about the DRUGS and the LESHHER's. They are as sorry as the drunk Crack head, Cooksey.”

3606. The statement involved a private matter.

3607. Alternatively, it involved a public matter.

3608. The statement referred to plaintiff by name and/or indirectly.

3609. The statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

3610. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3611. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3612. The statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3613. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3614. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshher's law practice, substantial damage to Rhonda Leshher's beauty salon, embarrassment, and ostracization within the community.

3615. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3616. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

Count 2549 – Libel Per Se

3617. Defendant’s written statement(s) described in Count 2548 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant’s statement(s) injured Plaintiff’s reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3618. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2550 - Defamation per se

3619. Defendant’s written statement(s) described in Count 2548 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3620. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2551 – Defamation

WTH

3621. Defendant published a statement by written communication asserting as fact that,“...they got 'HERPIES' and 'AIDS'!...Watch Rhondas 'TONGUE' it has dingle berries on it!”

3622. The statement involved a private matter.

3623. Alternatively, the statement involved a public matter.

3624. The statement referred to plaintiff by name and/or indirectly.

3625. The statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

3626. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3627. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3628. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3629. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3630. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Lesher's law practice, substantial damage to Rhonda Lesher's beauty salon, embarrassment, and ostracization within the community.

3631. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3632. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2552– Libel Per Se

3633. Defendant's written statement(s) described in Count 2551 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3634. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2553 - Defamation per se

3635. Defendant's written statement(s) described in Count 2551 was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3636. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2554 – Defamation  
You and them

3637. Defendant published a statement by written communication asserting as fact that, “You mean ol 'FRIVOLOUS LAWSUIT LOOSER LESHHER'!!!!!!!!!! My neighbors cow Just prolapsed after having a calf, that reminded me of Rhonda[Long]Leshher when I saw that thing!!!!!!!!!!”
3638. The statement involved a private matter.
3639. Alternatively, the statement involved a public matter.
3640. The statement referred to plaintiff by name and/or indirectly.
3641. The statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.
3642. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
3643. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.
3644. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.
3645. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.
3646. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.
3647. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.
3648. The statement was false because Plaintiff has not participated in the conduct alleged by the Defendant.
3649. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.
3650. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshher’s law practice, substantial damage to Rhonda Leshher’s beauty salon, embarrassment, and ostracization within the community.
3651. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3652. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2555--Defamation per se

3653. Defendant's written statement(s) described in Count 2554 defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3654. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

3655. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3656. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2556– Libel Per Se

3657. Defendant's written statement(s) described in Count 2254 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3658. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2557-Defamation Young ears

3659. Defendant published a statement by written communication asserting as fact that, "...When I was getting my hair done at Unique Touch all they all talked about was sex and

drugs. Rhonda invariably talked about how she liked chincas and always had sex with them while her husband Mark watched...”

3660. The statement involved a private matter.

3661. Alternatively, the statement involved a public matter.

3662. The statement referred to plaintiff by name and/or indirectly.

3663. The statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

3664. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3665. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation.

3666. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3667. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3668. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3669. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant’s post.

3670. The statement was false because Plaintiff has not participated in the conduct alleged by the Defendant.

3671. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3672. Defendant’s false statement caused injury to plaintiff, including substantial damage to Mark Leshar’s law practice, substantial damage to Rhonda Leshar’s beauty salon, embarrassment, and ostracization within the community.

3673. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3674. Exemplary damages. Plaintiff’s injury resulted from defendant’s malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2558 Defamation per se

3675. Defendant's written statement(s) described in Count 2557 defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3676. Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

3677. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3678. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2559 – Libel Per Se

3679. Defendant's written statement(s) described in Count 2257 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3680. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Count 2560 – Defamation

youu

3681. Defendant published a statement by written communication asserting as fact that, "Wonder how Rhonda liked 'TONGUEING' her 'BUTT'? Rhonda 'SUCKED' really hard!"

3682. The statement involved a private matter.

3683. Alternatively, the statement involved a public matter.



3684. The statement referred to plaintiff by name.

3685. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3686. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3687. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3688. The statement was false because Plaintiff does not participate in the type of sexual misconduct described in Defendant's post.

3689. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3690. Defendant's false statement caused various injuries to Plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3691. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3692. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law. Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Count 2561– Libel Per Se

3693. Defendant's written statement(s) described in Count 2560 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3694. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Count 2562- Defamation per se

3695. Defendant's written statement(s) described in Count 2560 was defamatory per se under the common law because Defendant imputed sexual misconduct to the Plaintiff. This type of allegation makes a Defendant strictly liable to the Plaintiff under Texas law because it is libelous per se.

3696. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Counts 2563-2564 – Defamation

yoyo

3697. Defendant published a statement by written communication asserting as fact that,  
a. "...This 'TRIO OF TRASH' drugged and 'RAPED' a lady at the Leshers 'COMPOUND'! While the victom was waking form being drugged with a 'DATE RAPE DRUG' Rhonda Lesher was sucking and biting the victims vagina, giving her an oral 'DOUCHE'..."  
b. "...Packages from Rhondas 'UNIQUE TOUCH'! Free 'BLOW JOB' or 'ORAL DOUCHE' with first visit!...'HERPIES'..."

3698. The statement involved a private matter.

3699. Alternatively, the statement involved a public matter.

3700. The statement referred to plaintiff by name and/or indirectly.

3701. The statement was defamatory because it unambiguously accused the Plaintiff of sexual misconduct.

3702. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by innuendo.

3703. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of sexual misconduct by implication.

3704. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of conduct that injured his and/or her professional occupation.

3705. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by implication.

3706. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of conduct that injured his and/or her professional occupation by innuendo.

3707. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of committing a crime.

3708. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by innuendo.

3709. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiffs of committing a crime by implication.

3710. Additionally and/or alternatively, the statement was defamatory because it unambiguously accused the Plaintiff of having a loathsome disease.

3711. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by implication.

3712. Additionally and/or alternatively, the statement was defamatory because it accused the Plaintiff of having a loathsome disease by innuendo.

3713. The statement was false because Plaintiff does not have the loathsome disease imputed by the Defendant.

3714. Additionally and/or alternatively, the statement was false because Plaintiffs did not commit the crime that they were accused of committing.

3715. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in said sexual misconduct.

3716. Additionally and/or alternatively, the statement was false because Plaintiff did not engage in conduct injuring his and/or her occupation.

3717. Defendant is strictly liable because his allegation concerns a private issue and a private Plaintiff.

3718. Defendant's false statement caused injury to plaintiff, including substantial damage to Mark Leshner's law practice, substantial damage to Rhonda Leshner's beauty salon, embarrassment, and ostracization within the community.

3719. Plaintiff seeks unliquidated damages within the jurisdictional limits of this court.

3720. Exemplary damages. Plaintiff's injury resulted from defendant's malice, which entitles plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a). More specifically, Plaintiffs are private figures, the allegations concern private matters, Plaintiffs incurred actual damages, and the Defendant acted with malice as it is defined under Texas law.

Alternatively, in the event that the Court determines that the issues are public, Defendants acted with negligence, Plaintiffs incurred actual damages, and the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages. Alternatively, if the court finds that the Plaintiffs are public figures and the issues themselves are public, the Plaintiffs are entitled to actual damages because the Defendants acted with the requisite actual malice (under federal law) and malice (under Texas law) necessary to support a finding of exemplary damages.

#### Counts 2565-2566- Defamation per se

3721. Defendant's written statement(s) described in Count 2563-2564 was defamatory per se under the common law because Defendant falsely accused the Plaintiff of committing a crime.

3722. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant injured plaintiff in his or her profession and/or occupation.

3723. Further, Defendant's statement(s) is also defamatory per se under the common law because Defendant falsely accused the Plaintiff of sexual misconduct

3724. Further, Defendant's written statement(s) was defamatory per se under the common law because Defendant falsely imputed a loathsome disease to Plaintiff.

3725. These type of allegations make a Defendant strictly liable to the Plaintiff under Texas law because they are libelous per se.

3726. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

#### Counts 2567-2568 – Libel Per Se

3727. Defendant's written statement(s) described in Count 2563-2564 was libel per se as defined by the Texas Civil Practice and Remedies Code § 73.001. Defendant's statement(s) injured Plaintiff's reputation and exposed Plaintiff to public hatred, contempt, ridicule, and/or financial injury.

3728. The defamatory statement(s) requires no proof of its injurious character because it was obviously hurtful to the Plaintiff.

Jury Demand

3729. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

Prayer

3730. For these reasons, Plaintiff asks that the court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendants for the following:

1. Actual damages;
2. Special damages;
3. Nominal damages;
4. Exemplary damages;
5. Prejudgment interest;
6. Postjudgment interest;
7. Court costs; and
8. All other relief to which plaintiff is entitled.

Respectfully submitted,

---

WILLIAM PIERATT DEMOND  
State Bar No. 24058931

GEOFFREY S. CONNOR  
State Bar No. 04702650

MEAGAN HASSAN  
State Bar No. 24065385

**Connor & Demond, PLLC**

701 Brazos Street  
Suite 500

Austin, Texas 78701

Telephone: (512) 917.2111

Telecopier: (512) 519.2495

ATTORNEYS FOR PLAINTIFFS  
MARK AND RHONDA LESHER