



<p>DISTRICT COURT, ARAPAHOE COUNTY Arapahoe County Justice Center 7325 S. Potomac Street Centennial, Colorado 80112</p>	
<p>Plaintiff and Counterclaim Defendant: TAMEIRA LEE HOLLANDER, M.D.</p> <p>v.</p> <p>Defendant and Counterclaimant: JOHN W. BAILEY, BARBARA A.B. BAILEY and CHRISTINE BAKER</p> <p>Counterclaim and 3rd Party Defendants: IRVING G. JOHNSON, PRYOR JOHNSON CARNEY KARR NIXON, P.C. and MATHEW HILTON</p>	
<p>Christine Baker  Fax: 571-222-1000 Email: christine@</p>	<p>Case No.: 08CV2229 Division: 407</p>
<p align="center">DEFENDANT CHRISTINE BAKER'S ANSWER AND COUNTER CLAIMS</p>	

Defendant Christine Baker (“Baker”) hereby answers the Complaint of Plaintiff Dr. Tameira Hollander (“Hollander”) and states her counterclaims as follows:

1. Baker has insufficient knowledge to confirm or deny the statements and allegations in paragraphs 1-13.
2. Baker denies the allegations pertaining to her in paragraph 14.
3. Baker has insufficient knowledge to confirm or deny the statements and allegations in paragraphs 15 – 20.
4. Baker denies the allegations pertaining to her in paragraph 21.

5. Baker has insufficient knowledge to confirm or deny the statements and allegations in paragraph 22.
6. Baker denies the allegations pertaining to her in paragraph 23.
7. Baker incorporates her answers to paragraphs 1 – 23 of the Complaint.
8. Baker has insufficient knowledge to confirm or deny venue and she denies any allegations against her in paragraph 25.
9. Baker has insufficient knowledge to confirm or deny jurisdiction and she denies any allegations against her in paragraph 26.
10. Baker denies any allegations pertaining to her in paragraph 27.
11. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 28.
12. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 29.
13. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 30.
14. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 31.
15. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 32.
16. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 33.
17. Baker denies any allegations pertaining to her in paragraph 34.
18. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 35.
19. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 36.

20. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 37.
21. Baker has insufficient knowledge to confirm or deny allegations against the Baileys and she denies any allegations pertaining to her in paragraph 38.
22. Baker does not need to answer paragraphs 39 – 45 as they only pertain to the Baileys.
23. Baker denies any allegations contained in the “DAMAGES” section of the Complaint pertaining to her.

AFFIRMATIVE DEFENSES

24. AS AND FOR A FIRST AFFIRMATIVE DEFENSE, Baker alleges that persons other than her were and are wholly and partially responsible for Hollander’s damages, if any.
25. AS AND FOR A SECOND AFFIRMATIVE DEFENSE, Baker alleges that any and all liability for the claims made against her in the Complaint were caused and are the result of acts or omissions by parties other than her. If Hollander suffered or sustained any damage or injury, either as alleged in the Complaint, or at all, the same was directly and proximately contributed to by the negligence, recklessness, carelessness, fault, and/or unlawful conduct of other persons or entities, whether or not parties to this action, and damages to Hollander, if any, shall be reduced in proportion to the amount of negligence and/or fault attributable to such other persons or entities, whether or not parties to this action.
26. AS AND FOR A THIRD AFFIRMATIVE DEFENSE, Baker alleges that Hollander failed to take reasonable action to avoid or mitigate the alleged detriments or damages, if any, and such failure bars and/or reduces Hollander’s recovery, if any, against her.
27. AS AND FOR A FOURTH AFFIRMATIVE DEFENSE, Baker alleges that the imposition of punitive or exemplary damages against her would violate her constitutional rights under the Due Process clauses in the Fifth and Fourteenth Amendments to the Constitution of the United States; the Double Jeopardy; clause in the Fifth Amendment to the Constitution of the United States; similar provisions in Colorado Constitution; common law; public policy; applicable statutes and court rules.

28. AS AND FOR A FIFTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander by her acts and omissions, is estopped from seeking any relief against her.
29. AS AND FOR A SIXTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander's claims against her are barred as a result of Hollander's unclean hands.
30. AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander's claims against her are barred by the doctrine of laches.
31. AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander's claims against her are barred by the doctrine of waiver.
32. AS AND FOR AN NINTH AFFIRMATIVE DEFENSE, Baker alleges that if Hollander suffered or sustained any damage or injury, either as alleged in the Complaint or at all, the same was caused by a risk, if any there was, knowingly and willingly assumed by Hollander.
33. AS AND FOR A TENTH AFFIRMATIVE DEFENSE, Baker alleges that the alleged causes of action in the Complaint, and each of them, are uncertain, ambiguous, and/or unintelligible.
34. AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE, Baker alleges that she owed no duty of care whatsoever to Hollander.
35. AS AND FOR A TWELFTH AFFIRMATIVE DEFENSE, Baker contends that all communications, if any, were privileged, which bars Hollander from any recovery with respect to the matters alleged.
36. AS AND FOR A THIRTEENTH AFFIRMATIVE DEFENSE, Baker contends that all communications, if any, were protected by the First Amendment to the Constitution of the United States.
37. AS AND FOR A FOURTEENTH AFFIRMATIVE DEFENSE, Baker alleges that the representations which Hollander alleges Baker made were not false when made.
38. AS AND FOR A FIFTEENTH AFFIRMATIVE DEFENSE, Baker alleges that the representations which Hollander alleges Baker made, if actually made, were made with an honest, good faith belief in their truth.

39. AS AND FOR A SIXTEENTH AFFIRMATIVE DEFENSE, Baker alleges that the actions complained of were made without malice or wrongful intent on the part of her and in a reasonable and good faith belief of her legal right to perform the actions complained of.
40. AS AND FOR A SEVENTEENTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander's claims for punitive damages must fail as a matter of law because she has failed to allege specific facts constituting malice, oppression or fraud.
41. AS AND FOR A EIGHTEENTH AFFIRMATIVE DEFENSE, Baker alleges that Hollander's claims are pre-empted by applicable federal and state statutory laws, agreements, charters and treaties.
42. AS AND FOR A NINETEENTH AFFIRMATIVE DEFENSE, Baker alleges that the Complaint fails to state facts sufficient to support a claim for punitive damages.
43. AS AND FOR A TWENTIETH AFFIRMATIVE DEFENSE, Baker alleges that she reserves the right to offer additional defenses which cannot now be articulated due to Hollander's failure to particularize her claims or due to Baker's lack of knowledge of the circumstances surrounding Hollander's claims. Upon further particularization of the claims by Hollander or upon discovery of further information, Baker will amend such Answer.

COUNTERCLAIMS AND 3RD PARTY DEFENDANTS

44. Counter Claim / 3rd Party Defendant Irving G. Johnson ("Johnson") is the attorney representing Hollander who signed the false filings.
45. Counter Claim / 3rd Party Defendant Pryor Johnson Carney Karr Nixon, P.C. ("Pryor Johnson") is the law firm representing Hollander.
46. Counter Claim / 3rd Party Defendant Mathew Hilton ("Hilton") submitted many abusive and threatening comments and emails regarding this case to Baker despite her repeated requests to cease contacting her and he emailed insults with the pictures of her home and personal property taken by the process server. Baker is not certain that "Mathew Hilton" is his real name, but it is how he identified himself to her.

BACKGROUND

47. Baker is an outspoken consumer rights advocate (NOT an attorney) and since 1995 she published at her various websites and forums her investigations, regulatory complaints and litigation involving scammers, criminals, credit bureaus, banks and many other dishonest businesses.
48. Baker is a FICO credit scoring expert and some of her major documentaries about credit scoring formula bugs, systemic credit reporting problems, foreclosure fraud and a partial listing of her web sites are at <http://creditfactors.com/about/history/>.
49. Baker's websites and forums contain well over 10,000 of her own postings and many more posts by her readers.
50. In about 1996, the San Mateo, California, superior court denied internet service provider Zoom.com's motion to order Baker's allegedly libelous Zoom.com webpage removed. Baker has few details as she was not invited to the hearing, but according to a San Mateo Times reporter, the court felt that she had the right to express their opinion and Zoom.com went out of business shortly thereafter.
51. Consumers must be able to publicly discuss professionals and businesses providing shoddy products and substandard services. It is almost impossible for consumers to prevail in court against unscrupulous businesses and even when consumers prevail, they very rarely receive compensation for their time wasted and the emotional distress and aggravation suffered due to the litigation.
52. Regulators usually ignored Baker's and her readers' many complaints and Baker documented that the regulators' corruption greatly contributed to America's current financial crisis.
53. Consumers who share their experiences and reviews of professionals and companies on the internet are essentially providing the only means to research products and services and to prevent being defrauded or in the worst case, getting killed or losing a loved one due to malpractice.
54. Baker routinely receives legal threats of libel and defamation suits from the subjects of her investigations and it is her policy to request identification of specific FALSE publications for corrections and/or updates. Baker cannot recall ever receiving a notice identifying any false statements from anyone and

specifically not from Hollander or anyone on her behalf.

55. While Baker removes links in the SIDEBARS without a trace as they become outdated unless deletion is demanded, it is Baker's policy NOT to remove or alter blog or forum posts (other than spelling or grammar corrections).
56. Despite many threats of violence or lawsuits, blackmail and extortion, Baker never deleted content from her websites and she also refuses to accept bribes. She declined a \$10,000 offer for deletion of all references to a company.
57. When Baker posts a negative review of a company, she makes a sincere effort to notify it and usually she emails a "Notice of Publication" with a request for comments.
58. Baker will gladly update with corrections or new information and she frequently encourages persons complaining about allegedly defamatory statements to submit their factual statements for unedited publication. Rarely (if ever) does Baker receive a response, presumably because her assessments of the companies or persons are accurate and their goals are deletion of ACCURATE negative statements.

FACTUAL STATEMENTS

59. Baker incorporates by reference the foregoing paragraphs as though fully set forth herein.
60. When Baker first visited the Baileys' website <http://www.tameirahollander-nearlykilledmywife.com/>, she was extremely impressed with the professionalism and extraordinary detail and documentation at their website.
61. Baker placed a link to <http://www.tameirahollander-nearlykilledmywife.com/> from the sidebar at her blog <http://creditsuit.org/> and she wrote: "A great site and fantastic example of how everybody should DOCUMENT and PUBLICIZE their complaints!"
62. In her 15 years of publishing, Baker has linked to many consumer complaint or "sux" sites. Eventually, Baker would check a link and find that it was no longer active or relevant or a reader would notify her of the bad link and she deleted the link.
63. On 8/9/08, Baker received this anonymous submission through her web contact form [Exhibit 1]:

Entry Date: 2008-08-09 04:00 PM

Form Name: support

Name: reporting abuse

Email: info@dynamnichealthdh.com

Website: <http://tameirahollandermd.com>

message: Information posted on this site is LIBEL. It can be PROVEN as such by MEDICAL RECORDS and confirmed by regulatory agencies. Removing all references to this site will protect you from litigation.

64. Baker is not aware of ever having posted references to “this site” (<http://tameirahollandermd.com>) and on 8/10/08, the very next day, she responded by email to info@dynamnichealthdh.com, the email address provided in the anonymous submission:

Providing the URL(s), the EXACT quotes that are libelous and the documentation will result in corrections and/or updates.

Sincerely,

Christine Baker

65. Baker’s email was returned undeliverable as it apparently contained a typo.
66. Baker posted the complete and unaltered communications at her blog at creditsuit.org in a new entry and to the best of her knowledge, this was the first time that she blogged about Hollander.
67. Instead of identifying any allegedly libelous statement as Baker requested in her (posted) 8/10/08 email to Hollander, her attorney Johnson filed the 10/17/08 verified Complaint.
68. Paragraph 14 of the Complaint is entirely FALSE:

14. Thereafter, the Defendant Christine Baker published and caused to be published and republished this same false and libelous information about Dr. Hollander, and in spite of being contacted by Dr. Hollander who was requesting that it be removed from the internet, refused and failed to do so to and including the present time.

- a. Baker never published, caused to be published or republished the Baileys' sites.
- b. Baker NEVER received a request for removal of her link to Baileys' site.
- c. Baker never refused to remove anything for Hollander, but in fact **Baker requested identification of libelous information** in response to the 8/9/08 anonymous request to remove a different link which to the best of her knowledge was NEVER posted at any of her sites.
- d. Hollander failed to identify any link actually posted at Baker's site and she failed to provide any URL or quote of allegedly libelous information DESPITE Baker's PUBLISHED invitation.

69. Paragraph 21 of the Complaint is also entirely FALSE:

21. Thereafter, as Dr. Hollander undertook research and attempted to learn of means by which the defamatory information from the Bailey websites could be removed, she contacted Christine Baker, the author/owner of <http://creditsuit.org/> and informed Ms. Baker that her website contained defamatory information. Ms. Baker thereafter notified the Baileys in aid of their defamation of Dr. Hollander and, as previously stated, refused and failed to remove from her website the defamatory information.

This seems to be a duplicate of paragraph 14 of the Complaint and it is just as false.

70. In paragraph 23 of the Complaint, Hollander makes additional entirely FALSE allegations as pertaining to Baker:

23. The Baileys and Ms. Baker published statements which constitute libel *per se* regarding Dr. Hollander with the specific intention of damaging and/or destroying Dr. Hollander's professional reputation, discouraging existing patients from continuing to see Dr. Hollander, discouraging new patients from seeing Dr. Hollander, and discouraging the public in general from purchasing and reading Dr. Hollander's publication.

Again, no statement constituting libel *per se* on Baker's website(s) was ever identified or documented.

71. On 10/17/08, Hollander also filed the Motion for Temporary Restraining Order and Baker is mentioned only 3 times:

- a. In the caption
- b. In the 1st paragraph: “Plaintiff Tameira L. Hollander, M.D. ("Dr. Hollander"), by and through her counsel, Pryor Johnson Carney Karr Nixon, P.C., hereby submits this Motion for Temporary Restraining Order against Defendants John W. Bailey, Barbara A.B. Bailey, and Christine Baker.”
- c. Requested relief: (B) Ordering Defendant Baker to remove the blog referencing Dr. Hollander from the website www.CreditSuit.org.

Baker could not find any false Hollander statements or allegations pertaining to her in this Motion because she could not find a single statement or allegation pertaining to her.

72. Hollander’s Affidavit is attached as Exhibit E to the Motion for TRO and in paragraph 8 she states:

I deny that I am a thief, a liar, an attempted murderer, and I deny also that I am a bad doctor. These statements are published in a public forum and are searchable online using the common variations of my name such that anyone searching the internet is invariably drawn into the Bailey website **and its companion Baker website. Their characterizations and references are false and have in the past and continue to the present to damage and undermine my credibility and my reputation. [Emphasis added]**

Considering Hollander’s many false statements about Baker in her Verified Complaint, one can only conclude that she is in fact not only a liar, but a perjurer. She goes on to make the bizarre and totally false claim that Baker’s website is the “companion website” to the Baileys’ website.

73. In paragraph 11 of her Affidavit, Hollander repeats her FALSE allegations from the Complaint:

When I contacted Ms. Baker informing her that she, through her website, was publishing defamatory information, she was unwilling to remove the information, ...

74. Hollander's allegations against Baker are entirely unsubstantiated:

- a. No libelous statement on Baker's websites is identified.
- b. No exhibit substantiates the allegations of libelous statements at Baker's website(s).
- c. No exhibit documents any attempt to have an identified libelous statement removed from Baker's website(s).
- d. No exhibit substantiates Hollander's claims of Baker's refusal to remove libelous information from her website(s).

All allegations against Baker are completely fabricated.

75. After John Bailey was served with the Hollander suit, he informed Baker that he was settling and removing his websites and he requested that Baker delete the link to his website.

76. Of course Baker removed the link. Why would she link to a site that no longer exists?

77. On 11/25/08, Baker received a web form submission from Irving Johnson [Exhibit 2]:

Entry Date: 2008-11-25 11:05 AM

Form Name: support

Name: Irving G. Johnson

Email: ijohnson@pjckn

Website: <http://creditsiut.org>

message: Ms. Baker, I am Dr. Hollander's attorney. I gather you like to mix it up and involve yourself in causes. The Baileys decided to remove all their defamation from the web because this has gone on long enough. The truth is Dr. Hollander is an exceptional physician who has been maligned for a year and a half. I will gladly serve you **if you don't remove her name from your website.** I'm sure I can keep you fully entertained if that is what you prefer. Just let me know.[emphasis added]

78. Having received a number of "cease & desist" letters from attorneys representing subjects of her investigations, Baker did NOT believe that an attorney submitted this extremely unprofessional request. She expected every attorney to know how to spell "suit" and obviously the email address was NOT valid and it does not contain the word "law" as most law firm addresses.

79. However, it appears now that this request was in fact submitted by Hollander's attorney and Counterclaim Defendant Irving Johnson and finally it becomes clear that the Defendants' goal was not to have Baker remove allegedly libelous statements about Hollander. In fact, they wanted her to remove "her name." Notably, Johnson submitted this demand over a month after he filed suit and obtained the TRO.
80. Baker believes that the purpose of this submission was to intimidate her into removing all references to this lawsuit, especially since it did not contain valid contact information. Baker wonders whether both Hollander and Johnson submitted their demands deliberately without contact information so that she would not be able to request specifics.
81. While Johnson obviously had Baker's contact information, he failed to provide the Complaint or any other filings to Baker.
82. On 12/11/08, Baker's life was destroyed when a man terrorized her at 7:30 am. Baker is 50 years old, traveled throughout Europe and the Middle East and from Alaska to Mexico, mostly by herself, and she was never as scared as that morning when she woke up to a yelling and screaming maniac, banging on doors and even on the window by her bed.. Apparently he had determined where she was sleeping and Baker was terrified that he would open the unlocked door.
83. Baker attached "no trespassing" and dog warning signs to her driveway posts and while she did not have a gun at the time and never liked guns, she realized that she no longer enjoys the liberty to live without a loaded weapon close by.
84. In 2006 Baker had decided to move to a more remote location in part because she had been threatened by scammers and criminals due to her published investigations and she never expected anyone to enter a roped off private property in the Arizona desert without invitation because most people are armed and won't hesitate to shoot.
85. The next evening, she watched the intruder pull up to her driveway, remove the rope, drive onto her private property like he owned it and this time he identified himself as process server and left the filings related to this suit at the door.
86. Baker is very glad that she got her dog into the house because he probably would have growled at or attacked the process server who most likely would have shot her dog.

87. Baker removed her CreditSuit.org blog as ordered by the Court and she spent several days analyzing the Complaint, TRO, Court Order, and Affidavit and trying to figure out what on Earth she did wrong and what she could do to get her major website, the blog at CreditSuit.org back online.
88. Baker registered the new domain doctor-tameira-hollander-litigation.info, she scanned and posted the filings and she spent hundreds of hours researching her options and the law.
89. With the filings, the process server also delivered a threatening and intimidating letter from Johnson and once again not a single libelous or defamatory statement is identified. **[Exhibit 3]**
90. On 1/10/09, Mathew Hilton began to submit comments to Baker's new Hollander litigation blog. His first submitted comment:

Christine,

While I admire most of your credit battles, I have to disagree with you on this one. You ticked off the wrong person and now you are getting sued over it. If you are not careful, you might get hit with some costs or sanctions. Then that can become a judgment, a lien or a garnishment.

Step carefully. It can get really expensive if you mess up. Even if deep down you might be correct on some points of this issue, you are not documenting your claims enough to protect yourself from a defamation or slander lawsuit.

I suspect it is just a matter of time before you get a judgment or lien affecting your entire future.

Be careful

With 15 years of publishing experience, Baker did not believe for one second that Hilton had any admiration for her credit battles and he was obviously continuing the Johnson intimidation tactics.

91. Baker decided to ignore Hilton and to not approve any of the Hilton comments, hoping he would get tired of harassing her.
92. However, Hilton's comments became very disruptive and impacted very negatively on Baker's ability to work and she finally emailed to Hilton her

request that he stop submitting comments at her sites.

93. Hilton argued that he had the RIGHT to post at Baker's blog, even after she informed him that she would charge a handling fee for his emails and comments.
94. Hilton started the blog <http://christinebakerfraud.blogspot.com/>, Baker requested that he remove the word "fraud" from the URL and he refused.
95. Hilton also posted entirely false defamatory statements about Baker on at least one other site to destroy her reputation.
96. Hilton would not quit submitting comments and sending email to Baker and he continually provided his unsolicited LEGAL advice, presumably without a license to practice law.
97. Baker pleaded with Hilton to stop contacting her and he became even more abusive.
98. On 1/18/09, Hilton threatened in email to Baker: **"We are going to get you this time."** [emphasis added]
99. On 1/18/09, Hilton sent a 2nd email [**Exhibit 4**]:

Subject: Your house looks like crap

Do you really live in that shithole? [emphasis added]

100. Included with this email was a composite of pictures of Baker's home, car, laundry on the clothesline and camper, apparently taken by the process server while trespassing on her property on 12/11/08, as this is the date displayed on the pictures.
101. Extremely upset over this outrageous violation of her privacy and the escalating threats, harassment and abuse, Baker emailed to Johnson her request for an explanation. [**Exhibit 5**]
102. Baker also provided Johnson with the Hilton email header and the comment IP number so that he could subpoena subscriber information from Comcast, Washington, where Hilton apparently accessed the internet.
103. The 1/19/09 terse response from attorney Lauren Dorweiler with Pryor Johnson [**Exhibit 5**]:

Ms. Baker,

I am in receipt of your email. We have neither hired nor directed anyone to harass you.

Lauren E. Dorweiler, Esq.

104. Baker then emailed attorney Dorweiler [**Exhibit 5**]:

Ms. Dorweiler,

As I will be filing a harassment complaint, please let me know whether your office had the process server's pictures of my home and whether you provided the pictures to doctor Tameira Hollander or anyone else.

Thank you,

Christine Baker

105. Baker received no response and she filed a complaint with the Kingman sheriff. She was informed that as an officer of the court, the process server had the right to trespass on Baker's private property and to terrorize her. The deputy insisted that Hilton's harassment should be addressed in court. Eventually he promised a call from a deputy with more knowledge about internet harassment to assist with Hilton's harassment and abuse, however, Baker received no call.

106. Deputy N. Fiacco with the Arapahoe county sheriff refused to take Baker's perjury report about Hollander and he insisted that Baker had to pursue the matter in court. When she explained that she does not have \$7,500 to hire a Colorado attorney, he insisted that she could easily find a local Arizona attorney offering free consultations by checking her phone book. Not only was he providing awful legal advice, but he was rude and abusive.

107. Apparently Baker has no choice but to represent herself and to continue to widely publicize this case in hopes of eventually finding an attorney to represent her on contingency.

108. The Counterclaim Defendants conspired to intimidate, abuse and harass Baker into deleting all references to Hollander from her websites, first by naming Baker in this entirely frivolous harassment Complaint based only on Hollander's perjury with regards to the allegations against Baker and then

through Johnson's threats and finally Hilton's abuse and harassment.

109. The Counterclaim Defendants are monitoring Baker's websites and apparently they printed and filed Baker's 12/15/08 Factual Summary with the Affidavit of Service and therefore there is no question that the attorneys knew that the allegations against Baker are entirely false.
110. The Counterclaim Defendants were also fully aware that Baker has been suffering health and financial problems due to this harassment suit and the related abuse.
111. Pursuant to the Court's Order, CreditSuit.org has been shut down for almost 2 months and it was Baker's main source of income as most of her business came through this site due to the high quality credit and FICO scoring information and truly unique content.
112. While Baker hates to have to beg, she has no choice but to set up a web page to ask for donations to assist with paying for expenses related to this litigation and to post links to her Hollander litigation blog and her requests for donations and legal assistance at many consumer and legal internet sites.
113. 3rd Party Defendants Johnson, Pryor Johnson and Hilton caused more damages to Hollander than the Baileys websites ever did. They expected Baker to immediately remove Hollander's "name" from her website because most people are so easily intimidated by lawyers.
114. However, Johnson or any paralegal at Pryor Johnson should have noticed the prominent links to Baker's litigation, Bar complaints, etc. posted next to the link to Hollander's site.
115. Through her litigation Baker had many encounters with lying lawyers and she learned that the American judicial system and the rules are deliberately designed so that the party with more money and the better liar usually wins.
116. Baker is fully aware that she doesn't have a snowball's chance in hell of prevailing in this lawsuit as a pro se litigant. However, she doesn't live to win, she lives to publish the TRUTH and to change the world to make it a better place for all.
117. The 3rd Party Defendants knew or should have known that naming Baker, encouraging Hollander to commit perjury and having Hilton harass and abuse Baker could only backfire and hurt Hollander.

118. If Hollander had NOT submitted her anonymous request for deletion of references to the Baileys' website and no other demands for deletions had been made, Baker most likely would not have mentioned Hollander at her blog. Baker would have deleted the link after finding out on her own that the Bailey's site was no longer active.

FIRST CLAIM FOR RELIEF

(Defamation and Libel: All Counterclaim Defendants)

119. Baker incorporates by reference the foregoing paragraphs as though fully set forth herein.
120. The Counterclaim Defendants published and/or caused to be published false statements to third persons regarding Baker and such persons include, but are not limited to, Baker's clients, both past and present, other consumer activists, the general public, her neighbors and almost every business in her local community, and both referred and prospective clients who turn to the internet to find information about Baker before or during the course of credit and FICO score consultations with Baker.
121. The statements, which constitute libel *per se*, include but are not limited to assertions that Baker published false information, refused to remove false information, is being sued because she violated laws and that she is a fraud.
122. As a direct and proximate result of the Counterclaim Defendants' publications, Baker suffered damage to her reputation and suffered economic losses.
123. As a direct and proximate result of the Counterclaim Defendants' publications, Baker incurred expenses in an effort to mitigate the intentional harm from the Counterclaim Defendants' libel *per se*.
124. In addition, Baker experienced severe emotional distress, embarrassment, humiliation, and all of the emotion an intelligent, honest and sensitive person would experience when subjected to such defamation, especially knowing that the harm she was experiencing was intentional, done with malice and with the design and intent of causing her financial, professional and personal harm.
125. As a direct and proximate result of the foregoing conduct, Baker sustained injuries, damages and losses as more fully set forth hereinafter.

SECOND CLAIM FOR RELIEF

(Intentional Infliction of Emotional Distress: All Counterclaim Defendants)

126. Baker incorporates by reference the foregoing paragraphs as though fully set forth herein.
127. The Counterclaim Defendants' conduct individually and jointly was and is extreme and outrageous, and it is so outrageous in character, and so extreme in degree, that any reasonable person would regard the conduct as atrocious and outside the bounds of common decency.
128. All of the Counterclaim Defendants' actions and omissions to act were intentional, and were carried forth with the specific intent to cause Baker severe emotional distress, damage to her personal and professional reputation, and to FORCE Baker to delete TRUE statements about Hollander.
129. As a direct and proximate result of the foregoing conduct, Baker sustained injuries, damages and losses as more fully set forth hereinafter.

THIRD CLAIM FOR RELIEF

(Tortious Interference with Prospective Business Relationship: All Counterclaim Defendants)

130. Baker incorporates by reference the foregoing paragraphs as though fully set forth herein.
131. The Counterclaim Defendants intentionally acted in a manner they knew and hoped would interfere with Baker's current and prospective business relationships and interest both in her CreditFactors subscription and her credit and FICO scoring consulting services.
132. The Counterclaim Defendants knew, or if they deny it, certainly should have known, that their allegations of libel, intentional infliction of emotional distress and fraudulent business practices in a lawsuit and on public internet forums would affect Baker's current and prospective business relationships.
133. It is clear from the entirely false allegations against Baker that they were motivated by an intention to dissuade potential clients from seeking Baker's services and purchasing her subscription.
134. As a direct and proximate result of the Counterclaim Defendants' conduct Baker has been damaged in her professional career, it has likewise damaged

her in her personal life, and third, has a chilling and negative effect on the interest the public would have had otherwise in her subscription and services, as a result of which she has sustained loss of professional earnings and loss of revenues from the sale of her subscription and services.

135. The Counterclaim Defendants' conduct was improper, unlawful and unreasonably interfered with Baker's business as set forth.
136. As a direct and proximate result of the foregoing conduct, Baker sustained injuries, damages and losses as more fully set forth hereinafter.

FOURTH CLAIM FOR RELIEF

(Malicious Prosecution, Perjury and Subornation of Perjury: Hollander, Johnson and Pryor Johnson only)

137. Baker incorporates by reference the foregoing paragraphs as though fully set forth herein.
138. Hollander knew that her sworn statements and allegations were false and she hoped she would force Baker to delete her TRUE statements.
139. Johnson and Pryor Johnson knew, or if they deny it, certainly should have known, that Hollander's sworn statements and allegations pertaining to Baker were false and they hoped they would get paid or are being paid by Hollander to pursue Baker.
140. As a direct and proximate result of Hollander's, Johnson's and Pryor Johnson's conduct Baker has been damaged in her professional career, it has likewise damaged her in her personal life, and third, has a chilling and negative effect on the interest the public would have had otherwise in her subscription and services, as a result of which she has sustained loss of professional earnings and loss of revenues from the sale of her subscription and services.
141. Hollander's, Johnson's and Pryor Johnson's conduct was improper and unlawful.
142. As a direct and proximate result of the foregoing conduct, Baker sustained injuries, damages and losses as more fully set forty hereinafter.


DAMAGES

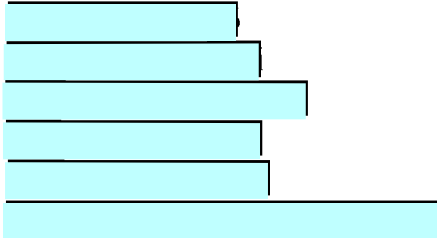
143. As a direct and proximate result of the aforesaid conduct of the Counterclaim Defendants Baker prays for relief as follows:

- a. Just and immediate compensation for Baker's non-economic damages, her economic losses, her emotional distress, damage to her reputation, and following discovery and keeping with the requirements pertaining to punitive damages. Baker seeks an award of punitive damages based upon the nature and extent of the Counterclaim Defendants' conduct both individually and jointly;
- b. Pre and post filing, and post judgment interest as provided by law;
- c. Assessable costs incurred in the prosecution of this action; and
- d. Such other and further relief as the Court may deem just and proper.

BAKER HEREBY DEMANDS A JURY TRIAL.

Respectfully submitted, February 11, 2009.



Christine Baker
Defendant and Counterclaimant


[REDACTED]

COMES NOW, Christine Baker, first being duly sworn, and states that the content of the foregoing Answer and Counterclaims is true and accurate and that the exhibits are true copies of the originals.

Subscribed and sworn to before me, this 11 day of February, 2009.




Notary Public

My Commission Expires: Sept 24 2012.