

DISTRICT COURT, ARAPAHOE COUNTY Arapahoe County Justice Center 7325 S. Potomac Street Centennial, Colorado 80112	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Plaintiff(s): TAMEIRA LEE HOLLANDER, M.D. v. Defendant(s): BARBARA A.B. BAILEY, JOHN W. BAILEY, and CHRISTINE BAKER	
Counsel for Plaintiff: Irving G. Johnson, Esq., #1423 Lauren E. Dorweiler, Esq., #40322 Pryor Johnson Carney Karr Nixon, P.C. 5619 DTC Parkway, Suite 1200 Greenwood Village, Colorado 80111-3061 Telephone: (303) 773-3500; Facsimile: (303) 779-0740 Email: ijohnson@pjckn.com Email: ldorweiler@pjckn.com	Case No.: 08CV2229 Division: 407
TAMEIRA L. HOLLANDER, M.D.'S RESPONSE IN OPPOSITION TO CHRISTINE BAKER'S MOTION TO VACATE THE TEMPORARY RESTRAINING ORDER AND MOTION TO RECONSIDER COURT ORDER DENYING PLAINTIFF'S MOTION FOR CONTEMPT CITATION	

COMES NOW, Tameira L. Hollander, M.D. ("Dr. Hollander"), by her counsel Pryor Johnson Carney Karr Nixon, P.C. and respectfully requests this Court to deny Defendant Christine Baker's Motion to Vacate the Temporary Restraining Order and requests that this Court reconsider its Order denying Plaintiff's Motion for Contempt Citation. In support thereof, Dr. Hollander states the following:

1. Dr. Hollander filed her Verified Complaint and Jury Demand, alleging defamation and intentional infliction of emotional distress on October 17, 2008. Contemporaneously, Dr. Hollander filed a Motion for Temporary Restraining Order.



2. Judge Jack Smith granted Dr. Hollander's Motion for Temporary Restraining Order on October 21, 2008 and a hearing was set for October 30, 2008. A copy of the October 21, 2008 Order is attached as **Exhibit 1**.
3. The October 21, 2008 restraining order requires Ms. Baker to "immediately remove the blog referencing Dr. Hollander from the website www.creditsuit.org and any other website containing a negative reference or critical opinion of Dr. Hollander." See **Exhibit 1**.
4. A preliminary injunction hearing was held on October 30, 2008, with Judge Jack Smith presiding. After this hearing, John and Barbara Bailey agreed to remove any and all libelous postings from the internet. They have complied with this agreement and have cooperated with Plaintiff to remove such websites. They contacted Ms. Baker and requested that she remove her posting. Ms. Baker refused to comply with their request.
5. The October 21, 2008 Order has not been vacated and remains valid against Ms. Baker.
6. Plaintiff requests that this Court refuse to vacate the October 21, 2008 Order against Ms. Baker until a hearing for a preliminary injunction can be scheduled.
7. Ms. Baker is causing imminent and irreversible damage to Dr. Hollander by continuing to post defamatory statements on the internet. Ms. Baker is in direct violation of the Order as detailed in Plaintiff's Motion for Contempt Citation, which is hereby fully incorporated by reference.
8. Plaintiff requests that this Court deny Ms. Baker's Motion to Vacate the Temporary Restraining Order and reconsider its Order denying Plaintiff's Motion for Contempt Citation.

Respectfully submitted, March 2, 2009.



PRYOR JOHNSON CARNEY KARR NIXON, P.C.

*Duly signed copy on file at the law offices of
Pryor Johnson Carney Karr Nixon, P.C.*

/s/ Lauren E. Dorweiler

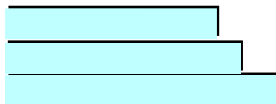
Irving G. Johnson, Esq., #1423
Lauren E. Dorweiler, Esq., #40322
Pryor Johnson Carney Karr Nixon, P.C.
5619 DTC Parkway, Suite 1200
Greenwood Village, Colorado 80111
Phone: (303) 773-3500

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2009 a true and correct copy of the foregoing **TAMEIRA L. HOLLANDER, M.D.'S RESPONSE IN OPPOSITION TO MS. BAKER'S MOTION TO VACATE THE TEMPORARY RESTRAINING ORDER AND MOTION TO RECONSIDER THE ORDER DENYING PLAINTIFF'S MOTION FOR CONTEMPT CITATION** was filed with the Court and served via *LexisNexis File & Serve* to the following via 1st Class U.S. Mail postage prepaid properly addressed as follows:

John W. Bailey
Barbara A.B. Bailey
5527 S. King Street
Littleton, CO 80123

Pro Se
Christine Baker



By: */s/ Lauren E. Dorweiler*

