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Attorney For Plaintiffs

BARBARA BAUER and BARBARA
BAUER LITERARY AGENCY, INC.

Plaintiffs
vs.

Jenna Glatzer and MacAllister Stone
and James D. MacDonald and Kent Brewster
and Ann C. Crispin and Patrick Nielsen-Hayden
and Teresa Nielsen-Hayden and Brian Hill,
and Dee Power aka Harrilane D. Power
aka D. Carr Harrilane, and David L. Kuzminski
and Thomas S. Tully and Science Fiction and
Fantasy Writers of America, Inc. and Victoria C. Strauss
and Shweta Narayan and Lesia Valentine and
Christina Walden aka Christina Bristol and
Wikimedia Foundation, and Stephan Spencer,
and Kristen Fischer aka Kristen Pascuili and
Gregory Ludwig and Aimee Amodio

Defendants

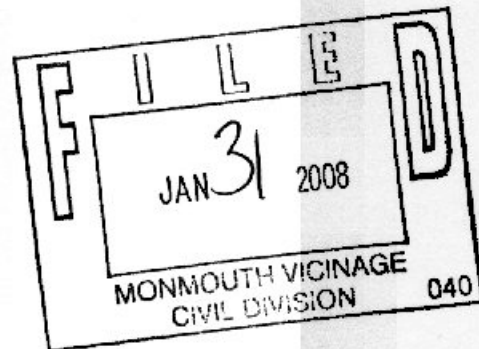
Plaintiff Barbara Bauer, residing at 179 Washington Avenue, Matawan, New Jersey 07747-2944, County of Monmouth, State of New Jersey, and plaintiff Barbara Bauer Literary Agency, Inc. ("BBLA"), with offices at 179 Washington Avenue, Matawan, New Jersey 07747-2944, County of Monmouth, State of New Jersey, by way of Complaint against defendants, says:

FIRST COUNT (DEFAMATION)

1. Plaintiff Barbara Bauer is a literary agent who for many years has conducted her business as a literary agent through BBLA, a New Jersey corporation.
2. Defendant Jenna Glatzer ("Glatzer") lives in Islip, New York, at mailing address P.O. Box 621, Islip, NY 11751.
3. At times relevant to this lawsuit, Glatzer has owned and operated and been responsible for the content of an internet website called AbsoluteWrite.com ("AW").

Superior Court of New Jersey
Monmouth County
Law Division
Docket No. L-1169-07
CIVIL ACTION

SECOND AMENDED
COMPLAINT



4. During the time that Glatzer owned and operated AW, she has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on AW, including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." claiming that plaintiff is not just a bad agent but a "scammer", that she is among agents who "...vacuum out your savings account..." and "...lie to you..." and that she has threatened 2/3 of the internet at least once."
5. The false and defamatory statements made by Glatzer concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
6. The statements made by Glatzer clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
7. As a direct and proximate result of defendant Glatzer's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
8. As a direct and proximate result of defendant Glatzer's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
9. As a direct and proximate result of defendant Glatzer's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Glatzer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

**SECOND COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE
ECONOMIC ADVANTAGE)**

1. Plaintiffs repeat and reallege the allegations of the previous COUNT as if same were set forth at length herein.

2. The publication by defendant Glatzer of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Glatzer's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Glatzer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRD COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant MacAllister Stone resides at 8911 Vernon Rd., M-#165, Everett (Lake Stevens), WA 98205.
3. At times relevant to this lawsuit, Stone has owned and operated and been responsible for the content of an internet website called AbsoluteWrite.com("AW")
4. During the time that Stone owned and operated AW, she has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on AW, including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." including claiming that plaintiff is not just a bad agent but a "scammer", that she is among agents who "...vacuum out your savings account..." and "...lie to you..." and that she has threatened 2/3 of the internet at least once."
5. Stone has also published and continues to publish false and defamatory statements about plaintiffs on her own blog including, but not limited to, calling plaintiff an "...inept-but-abusive supposed literary agent."

6. The false and defamatory statements made by Stone concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
7. The statements made by Stone clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
8. As a direct and proximate result of defendant Stone's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
9. As a direct and proximate result of defendant Stone's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
10. As a direct and proximate result of defendant Stone's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREFOR, plaintiffs request judgment against defendant Stone for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FOURTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Stone of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Stone's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Stone for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FIFTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant James D. MacDonald ("MacDonald") resides at 127 Main Street, Colebrooke, NH 03576..
3. Both on his own blog and on other sites on the internet MacDonald has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA including, but not limited to, claiming that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." that she is among agents who "...vacuum out your savings account..." and "...lie to you..." and that she is a "...dodgy player."
4. The false and defamatory statements made by MacDonald concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
5. The statements made by MacDonald clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
6. As a direct and proximate result of defendant MacDonald's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
7. As a direct and proximate result of defendant MacDonald's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
8. As a direct and proximate result of defendant MacDonald's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant MacDonald for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

SIXTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant MacDonald of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant MacDonald's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant MacDonald for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper

SEVENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Kent Brewster ("Brewster") resides at PMB 400, #109, 111 West El Camino Real, Sunnyvale, CA 94087-1057.
3. At times relevant to this lawsuit, Brewster has owned and operated and been responsible for the content of an internet website called Speculations.com ("Speculations").
4. Brewster has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on Speculations, including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." calling her the "Dumbest of the 20 Worst" agents,

claiming that she has "...no documented sales at all..." and accusing her of being a "...scammer..." and of engaging in "...random nuttiness."

5. The false and defamatory statements made by Brewster concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
6. The statements made by Brewster clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
7. As a direct and proximate result of defendant Brewster's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
8. As a direct and proximate result of defendant Brewster's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
9. As a direct and proximate result of defendant Brewster's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Brewster for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

EIGHTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Brewster of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Brewster's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Brewster for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

NINTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.²
2. Patrick Nielsen-Hayden ("P. N-Hayden") is employed at TOR Books, 175 Fifth Avenue, New York, NY 10010.
3. At all times relevant to this lawsuit, P. N-Hayden has owned and operated and been responsible for the content of an internet website called "Making Light."
4. P. N-Hayden has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA on Making Light, including, but not limited to, referring to plaintiff as "...a faux literary agent...", "...scam agent Barbara Bauer...", "...kooky..." "...that lunatic...", and questioning the legitimacy of her Ph.D. degree.
5. The false and defamatory statements made by P. N-Hayden concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
6. The statements made by P. N-Hayden clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
7. As a direct and proximate result of defendant P. N-Hayden's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
8. As a direct and proximate result of defendant P.N-Hayden's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

9. As a direct and proximate result of defendant P. N-Hayden's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Patrick Nielsen-Hayden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TENTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein. statements by defendant interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
2. As a direct and proximate result of defendant P. N-Hayden's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.
3. As a direct and proximate result of defendant P. N-Hayden's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Patrick Nielsen-Hayden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

ELEVENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Teresa Nielsen-Hayden ("T. N-Hayden") is employed at TOR Books, 175 Fifth Avenue, New York, NY 10010.
3. At all times relevant to this lawsuit, T. N-Hayden has owned and operated and been responsible for the content of an internet website called "Making Light".

4. T. N-Hayden has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA on Making Light, including, but not limited to, referring to plaintiff as "...a faux literary agent...", "...scam agent Barbara Bauer...", "...kooky..." "...that lunatic...", and questioning the legitimacy of her Ph.D. degree.
5. The false and defamatory statements made by T. N-Hayden concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
6. The statements made by T. N-Hayden clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
7. As a direct and proximate result of defendant T. N-Hayden's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
8. As a direct and proximate result of defendant T. N-Hayden's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
9. As a direct and proximate result of defendant T. N-Hayden's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Teresa Nielsen-Hayden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWELFTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant T. N-Hayden of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements

by defendant interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant T. N-Hayden's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Teresa Nielsen-Hayden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTEENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant Ann C. Crispin ("Crispin") is an officer and active member of defendant Science Fiction Writers of America, Inc. ("SFWA"), PO Box 877, Chesterton, MD 21620.

3 At times relevant to this lawsuit, Crispin has, along with defendant Victoria C. Strauss ("Strauss") operated and been responsible for the content of an internet website called Writer Beware ("WB") on behalf of the owner of Writers Beware defendant SFWA.

4 During the time that Crispin has operated Writer Beware, she has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA on WB, including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." This defamatory publication has been posted and quoted extensively on numerous other websites and blogs on the internet.

5 Crispin has also published and continues to publish false and defamatory statements about plaintiffs on other blogs and websites including, but not limited to, claiming that plaintiff has "...no verified sales to real advance and royalty paying publishers," and characterizing plaintiff as among a group of "questionable agents."

- 6 The false and defamatory statements made by Crispin concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
- 7 The statements made by Crispin clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
- 8 As a direct and proximate result of defendant Crispin's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
- 9 As a direct and proximate result of defendant Crispin's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
- 10 As a direct and proximate result of defendant Crispin's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Crispin for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FOURTEENTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Crispin of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Crispin's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Crispin for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FIFTEENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Victoria C. Strauss is an officer and active member of defendant Science Fiction and Fantasy Writers of America, Inc. ("SFWA"), PO Box 877, Chesterton, MD 21620, and resides at 27 Cosby Ave., Amherst, MA 01002.
3. At times relevant to this lawsuit, Strauss has along with defendant Crispin operated Writer Beware on behalf of SFWA and been responsible for its content.
4. During the time that Strauss has operated Writer Beware, she has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA on WB, including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." This defamatory publication has been posted and quoted extensively on numerous other websites and blogs on the internet. Strauss has also referred to plaintiff on WB as a "...scam agent..." and alleged that she engages in "...dirty business practices..."
5. Strauss has also published and continues to publish false and defamatory statements about plaintiffs on other blogs and websites including, but not limited to claiming that plaintiff has "...no documented and verified sales at all."
6. The false and defamatory statements made by Strauss concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
7. The statements made by Strauss clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
8. As a direct and proximate result of defendant Strauss's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has

sustained and will continue to sustain loss of income in amounts that will be established at trial.

9. As a direct and proximate result of defendant Strauss's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

10. As a direct and proximate result of defendant Strauss's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Strauss for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

SIXTEENTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant Strauss of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Strauss's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Strauss for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

SEVENTEENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant SFWA is a corporation doing business at 332 LaGuardia Plaintiff., #632, NY, NY 10012-1428 and PO Box 877, Chestertown, MD 21620.

3. At times relevant to this lawsuit, SFWA has owned WB, and has operated it through its agents defendants Crispin and Strauus.

4. As set forth at length in COUNTS THIRTEEN and FIFTEEN above, WB has published and continues to publish false and defamatory statements about plaintiffs including, but not limited to, posting a list of the "20 Worst Literary Agents", which includes false and defamatory statements about Barbara Bauer, including the statement that Barbara Bauer is among agents that have no "...significant track record of sales to commercial (advance paying) publishers..." This defamatory publication has been posted and quoted extensively on numerous other websites and blogs on the internet. WB has also referred to plaintiff as a "...scam agent..." and alleged that she engages in "...dirty business practices..."
5. SFWA has operated and continues to operate a website called "www.20worstagents.com" which has published false and defamatory statements about plaintiffs including alleging that plaintiff has "no sales." It has also published indecent images of plaintiff, specifically a photo of plaintiff taken without permission from plaintiff's agent's website, which had superimposed on it indecent licking actions of the mouth.
6. As the owner of WB defendant SFWA is responsible for its content.
7. The indecent photo and false and defamatory statements made by SFWA on WB concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
8. The statements made by SFWA on WB clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
9. As a direct and proximate result of defendant SFWA's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
10. As a direct and proximate result of defendant SFWA's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
11. As a direct and proximate result of defendant SFWA's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant SFWA for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

EIGHTEENTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by SFWA on WB of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant SFWA's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant SFWA for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

NINETEENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendants Brian Hill ("Hill") and Dee Power aka Harrilane D. Power aka D. Carr Harrilane ("Power") reside at 11832 N. Winchester Drive, Fountain Hills, AZ 85268.
3. Hill and Power own and operate The Snark Blog on which they make Internet postings under the fictitious name "Miss Snark, The Literary Agent." Hill and Power, as "Miss Snark" have published false and defamatory statements about plaintiffs Barbara Bauer and BBLA on The Snark blog, including, but not limited to, calling plaintiff a "scam artist", and referring to her associates as "her posse of dumbshits." Hill and Power, as Miss Snark, have produced and caused to be published on You Tube videos about Barbara Bauer entitled "Crouching Snark, Hidden Dragon" and "Miss Snark's Happy Hooker Crapstravaganza", the purpose of which were to belittle and defame plaintiffs with false and defamatory images and statements about plaintiff.

4. The false and defamatory statements and images made and created by Hill and Power concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

5. The statements made by Hill and Power clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Hill and Power's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Hill and Power's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendants Hill and Power's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendants Hill and Power for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTIETH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendants Hill and Power of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendants interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendants Hill and Power's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendants Hill and Power for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY FIRST COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Lesia Valentine, ("Valentine") address unknown, produced the You Tube videos about Barbara Bauer entitled "Crouching Snark, Hidden Dragon" and "Miss Snark's Happy Hooker Crapstravaganza", featuring defendant Snark, which belittle and defame plaintiffs with false and defamatory images and statements about plaintiff Barbara Bauer.
3. The false and defamatory statements made by Valentine concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
4. The statements made by Valentine clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
5. As a direct and proximate result of defendant Valentine's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
6. As a direct and proximate result of defendant Valentines's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
7. As a direct and proximate result of defendant Valentine's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOFRE, plaintiffs request judgment against defendant Valentine for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY SECOND COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Valentine of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Valentine's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Valentine for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY THIRD COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Christina Walden aka Christina Bristol("Walden") resides at 2836 Delaware Street, Oakland, CA 94602.
3. In or about May 2006 Walden registered and began to operate a website called 20worstagents.com, the very purpose of which was to defame plaintiffs and other literary agents. In a malicious attempt to injure plaintiffs personally and professionally Walden posted an indecent and defamatory photo of plaintiff Bauer superimposed on a list of agents which included BBLA.
4. The malicious actions of Walden concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
5. The actions clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Walden's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Walden's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Walden's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREFORE, plaintiffs request judgment against defendant Walden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY FOURTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by Walden of false and malicious images of plaintiffs set forth in the previous COUNT, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Walden's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Walden for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY FIFTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant David L. Kuzminski ("Kuzminski"), address unknown, owns and operates a website called Preditors and Editors (P&E).

3. Kuzminski has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on P&E and other websites and blogs, including, but not limited to referring to plaintiff on numerous occasions as a "...scammer..." and a "...scam..." and stating that plaintiff "...doesn't have any legitimate sales..."

4. The false and defamatory statements made by Kuzminski concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

5. The statements made by Kuzminski clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Kuzminski's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Kuzminski's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Kuzminski's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREFOR, plaintiffs request judgment against defendant Kuzminski for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY SIXTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant Kuzminski of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and

statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Kuzminski's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Kuzminski for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY SEVENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant Thomas S. Tully, ("Tully"), who resides at 7893 Melody Lane, Dublin, OH 43106, has at times relevant to this lawsuit owned and operated (P&E).

3. Tully has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on P&E and other websites and blogs, including, but not limited to referring to plaintiff on numerous occasions as a "...scammer..." and a "...scam..." and stating that plaintiff "...doesn't have any legitimate sales..."

4. The false and defamatory statements made by Tully concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

5. The statements made by Tully clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Tully's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Tully's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Tully's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Tully for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY EIGHTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Tully of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Tully's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Tully for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

TWENTY NINTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Stephan Spencer ("Spencer"), whose place of business is at 2820 Walton Commons West, Suite 123, Madison, WI 53718, owns and operates a website at writer.net.
3. Defendant Spencer has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on writers.net, including, but not limited to saying that plaintiff "...is a crook....," "... a thief....,"

“...is...scamming everyone...,” and is “...lying about her credentials,” by advertising the fact that she has a Ph.D.

4. The false and defamatory statements made by Spencer concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs’ professional reputation and career.

5. The statements made by Spencer clearly denigrated plaintiffs’ reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Spencer’s conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Spencer’s conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Spencer’s conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Spencer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTIETH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant Spencer of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant Spencer, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Spencer's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Spencer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY FIRST COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Wikimedia Foundation ("WF"), with offices at 200 Second Avenue South, # 358, St. Petersburg, FL 33701-4313, owns and operates Wikipedia, an online encyclopedia.
3. Defendant WF has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA including, but not limited to, referring to plaintiff as "The Dumbest of the Twenty Worst" literary agents, and stating that she "no documented sales at all."
4. The false and defamatory statements made by WF concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
5. The statements made by WF denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
6. As a direct and proximate result of defendant WF's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
7. As a direct and proximate result of defendant WF's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant WF's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

9. Plaintiff has informed WF that the statements about her are false and defamatory but WF has refused to remove the statements from Wikipedia, despite the fact that Brian Lamb the founder of WF has stated publicly that his website is accountable and that mistakes are removed in minutes.

WHEREFORE, plaintiffs request judgment against defendant Wikimedia Foundation for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY SECOND COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant WF of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant WF, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant WF's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Wikimedia Foundation for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY THIRD COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant Shweta Narayan ("Narayan") is employed at International Computer Science Institute, 1947 Center St., Suite 600, Berkeley, CA 94704..

3. In or about November, 2006, defendant Narayan published a paper and abstract which contained numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA including, but not limited to, referring to plaintiff as "a literary agent AW[Absolute Write] had exposed as a scam artist," and stating that "...Bauer claims to be a real literary agent..." and is a "well known scam artist." On November 4, 2006, Narayan repeated her false and defamatory statements in a public talk at the University of California, San Diego.

4. The false and defamatory statements made by Narayan concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

5. The statements made by Narayan denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Narayan's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Narayan's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Narayan's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Narayan for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY FOURTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant Narayan of the false and malicious statements about plaintiffs set forth in the previous COUNT, interfered with the prospective

economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Narayan's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Narayan for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY FIFTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendant Kristen Fischer aka Kristen Pascuili ("Fischer"), who resides at 3905 Herbertsville Rd., Point Pleasant, New Jersey 08742, owns and operates a website called Kristen Fischer.com ("KF.com"), and a blog called Written Out Loud ("WOL").
3. Fischer has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on KF.com and WOL including, but not limited to saying that plaintiffs have "...no verifiable record of sales to commercial publishing houses...", and have "...no documented and verified sales at all...."
4. The false and defamatory statements made by Fischer concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
5. The statements made by Fischer clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
6. As a direct and proximate result of defendant Fischer's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Fischer's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Fischer's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Fischer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY SIXTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. The publication by defendant Fischer of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Fischer's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Fischer for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY SEVENTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Gregory Ludwig ("Ludwig") who resides at 4 Ye Ole Log Tavern Drive, Highland Lakes, NJ 07422-0289 owns and operates a website called webusers.warwick.net ("Webusers") and he is a regular contributor to a blog run by Ann Crispin and Victoria Strauss..

3. Ludwig has published and continues to publish false and defamatory statements about plaintiffs Barbara Bauer and BBLA on Webusers and other websites and blogs, including, but not limited to saying, "Barbara Bauer a scammer."
4. The false and defamatory statements made by Ludwig concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.
5. The statements made by Ludwig clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.
6. As a direct and proximate result of defendant Ludwig's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.
7. As a direct and proximate result of defendant Ludwig's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.
8. As a direct and proximate result of defendant Ludwig's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Ludwig for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY EIGHTH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Ludwig of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.

3. As a direct and proximate result of defendant Ludwig's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Ludwig for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

THIRTY NINTH COUNT (DEFAMATION)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.

2. Defendant Aimee Amodio, ("Amodio") resides at 1100 River Avenue, Point Pleasant, NJ 08742.

3. Amodio has published and continues to publish numerous false and defamatory statements about plaintiffs Barbara Bauer and BBLA on websites and blogs, including, but not limited to, referring to plaintiff as a "...scam agent...", and saying that plaintiff was "...scamming..." and "...conning..." people.

4. The false and defamatory statements made by Amodio concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

5. The statements made by Amodio clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

6. As a direct and proximate result of defendant Amodio's conduct, plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

7. As a direct and proximate result of defendant Amodio's conduct, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

8. As a direct and proximate result of defendant Amodio's conduct, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOF, plaintiffs request judgment against defendant Amodio for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FORTIETH COUNT (TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. The publication by defendant Amodio of the false and malicious statements about plaintiffs set forth in the previous COUNT, as well as other actions and statements by defendant, interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendant Amodio's malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendant Amodio for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FORTY FIRST COUNT (CONSPIRACY TO DEFAME)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendants Jenna Glatzer, MacAllister Stone, James D. MacDonald, Kent Brewster, Ann C. Crispin, Patrick Nielsen-Hayden, Teresa Nielsen Hayden, Brian Hill, Dee Power aka Harrilane D. Power aka D. Carr Harrilane, David L Kuzminski, Thomas S. Tully, Science Fiction and Fantasy Writers of America, Inc., Victoria C. Strauss, Shweta Narayan, Lesia Valentine, Christina Walden aka Christina Bristol, Wikimedia Foundation, Stephan Spencer, Kristen Fischer aka Kristen Pascuili, Gregory Ludwig, and Aimee Amodio conspired and acted in concert with each other, as well as with other unnamed individuals and entities, to defame plaintiffs by publishing the false and malicious statements about plaintiffs set forth in the FIRST, THIRD, FIFTH, SEVENTH, NINTH, ELEVENTH, THIRTEENTH, FIFTEENTH,

SEVENTEENTH, NINETEENTH, TWENTY FIRST, TWENTY THIRD, TWENTY FIFTH, TWENTY SEVENTH, TWENTY NINTH, THIRTY FIRST, THIRTY THIRD. THIRTY FIFTH, THIRTY SEVENTH, and THIRTY NINTH COUNTS herein, as well as other defamatory statements.

3. The false and defamatory statements made by these defendants, acting in concert, concerning the personal, professional, and business reputation and character of plaintiffs were made maliciously and with intent to destroy plaintiffs' professional reputation and career.

4. The statements made by these defendants, acting in concert, clearly denigrated plaintiffs' reputation, and accused her of engaging in conduct and having traits incompatible with her business as a literary agent, and are thus defamatory per se under New Jersey law.

5. As a direct and proximate result of the joint conduct of these defendants plaintiff Barbara Bauer has been impaired in her ability to earn a living as a literary agent, and has sustained and will continue to sustain loss of income in amounts that will be established at trial.

6. As a direct and proximate result of the joint conduct of these defendants, plaintiff Barbara Bauer has suffered and will continue to suffer extreme mental anguish and distress.

7. As a direct and proximate result of the joint conduct of these defendants, the reputation of BBLA has been damaged and it has sustained and will continue to sustain loss of income in amounts that will be established at trial.

W HEREOFRE, plaintiffs request judgment against defendants Jenna Glatzer, MacAllister Stone, James D. MacDonald, Kent Brewster, Ann C. Crispin, Patrick Nielsen-Hayden, Teresa Nielsen Hayden, Brian Hill and Dee Power aka Harrilane D. Power aka D. Carr Harrilane, David L Kuzminski, Thomas S. Tully, Science Fiction and Fantasy Writers of America, Inc., Victoria C. Strauss, Shweta Narayan, Lesia Valentine, Christina Walden aka Christina Bristol, Wikimedia Foundation, Stephan Spencer, Kristen Fischer, Gregory Ludwig, and Aimee Amodio for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

FORTY SECOND COUNT (CONSPIRACY TO TORTIOUSLY INTERFERE WITH PROSPECTIVE ECONOMIC ADVANTAGE)

1. Plaintiffs repeat and reallege the allegations of the previous COUNTS as if same were set forth at length herein.
2. Defendants Jenna Glatzer, MacAllister Stone, James D. MacDonald, Kent Brewster, Ann C. Crispin, Patrick Nielsen-Hayden, Teresa Nielsen Hayden, Brian Hill and Dee Power aka Harrilane D. Power aka D. Carr Harrilane, David L Kuzminski, Thomas S. Tully, Science Fiction and Fantasy Writers of America, Inc., Victoria C. Strauss, Shweta Narayan, Lesia Valentine, Christina Walden aka Christina Bristol, Wikimedia Foundation, Stephan Spencer, Kristen Fischer aka Kristen Pascuili, Gregory Ludwig, and Aimee Amodio conspired and acted in concert with each other, as well as with other unnamed individuals and entities, to publish the false and malicious statements about plaintiffs set forth COUNTS TWO, FOUR, SIX, EIGHT, TEN, TWELVE, FOURTEEN, SIXTEEN, EIGHTEEN, TWENTY, TWENTY TWO, TWENTY FOUR, TWENTY SIX, TWENTY EIGHT, THIRTY, THIRTY TWO, THIRTY FOUR, THIRTY SIX, THIRTY EIGHT, and FORTY herein, and thereby interfered with the prospective economic advantage of plaintiffs by inducing prospective clients not to engage plaintiff as their literary agent.
3. As a direct and proximate result of defendants' malicious inducement to potential clients of plaintiffs not to engage plaintiff as their literary agent, plaintiffs suffered damages in amounts that will be established at trial.

WHEREFORE, plaintiffs request judgment against defendants defendants Jenna Glatzer, MacAllister Stone, James D. MacDonald, Kent Brewster, Ann C. Crispin, Patrick Nielsen-Hayden, Teresa Nielsen Hayden, Brian Hill and Dee Power aka Harrilane D. Power aka D. Carr Harrilane, David L Kuzminski, Thomas S. Tully, Science Fiction and Fantasy Writers of America, Inc., Victoria C. Strauss, Shweta Narayan, Lesia Valentine, Christina Walden aka Christina Bristol, Wikimedia Foundation, Stephan Spencer, Kristen Fischer aka Kristen Pascuili, and Gregory Ludwig for compensatory and punitive damages, together with counsel fees, costs of suit, and other relief as the court may deem proper.

. CERTIFICATION-NO OTHER ACTION TAKEN (R. 4:5-1)

The plaintiffs hereby certify that the matter in controversy is not the subject of any other action pending in any court and is likewise not the subject of any pending arbitration proceeding. The plaintiffs further certify that they have no knowledge of any contemplated action or arbitration proceeding which is contemplated regarding the subject matter of this action. The plaintiffs further certify that they are not aware of any other parties who should be joined in this action.

DEMAND FOR JURY TRIAL

The plaintiffs hereby demand trial by jury as to all issues in the above matter.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to New Jersey Court Rule 4:10-2(b), demand is made that defendants disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

DESIGNATION OF TRIAL ATTORNEY

In accordance with R. 4:25-4, Dan Martin is hereby designated as trial counsel for plaintiffs in the above matter.

Dated: January 23, 2008



Dan Martin
Attorney For Plaintiffs