

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

**Civil Action No. 09 CV 00309 MSK-KMT**

**SHELL**

**v.**

**AFRA, *et al.***

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**OBJECTION TO PLAINTIFF'S EMERGENCY MOTION REGARDING  
DOCUMENT #203**

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**COMES NOW**, Dorothy Kernaghan-Baez to object to the plaintiff's emergency motion to seal Document 203. I also object to the plaintiff being granted a protective order. In support of my objection I state the following:

1. Document 203, filed by Brenda Swallow, does **NOT** contain trade secrets as the plaintiff falsely claims.
2. By falsely claiming that Document 203 contains trade secrets, the plaintiff is attempting to mislead this Court in hopes that the judges have not actually read the attachments in Document 203.
3. Document 203 contains evidence of substantial wrongdoing by the plaintiff.
4. This evidence, along with other documentation, is essential to defenses that will be made should this case go forward.
5. Document 203 contains admissions by the plaintiff, as well as her agent(s), as to the plaintiff's long-running effort to undermine and destroy the defendants.

6. These admissions include confessions of anti-trust activities, the plaintiff's intent to eliminate those she considers her "competitors," and supports my assertion that the plaintiff has a history of attempting, through defamation, to eliminate those she considers to be her "competitors."
7. It is my belief and contention that the plaintiff has demonstrated an ongoing pattern, along with her agent(s), of criminal libel as defined by C.R.S. 18.13.105.
8. Document 203 contains admissions that the plaintiff and/or her agent(s) freely distributed papers containing the plaintiff's alleged "trade secrets."
9. One cannot freely distribute information claimed as "proprietary" and reasonably expect the information to remain a "secret."
10. I ask this Court to deny the plaintiff's motion; or, in the alternative, not to grant the plaintiff's motion without holding an evidentiary hearing so that the merits of the objections can be heard.
11. I also ask this Court to consider holding the plaintiff in contempt for her false statements to this Court;
12. That this matter be dismissed as to all defendants as sanction for her false statements.
13. Any additional relief that this Court deems just and proper.

Respectfully Submitted,

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(Mrs.) Dorothy Kernaghan-Baez

Certificate of Service

I hereby certify that on the 7th day of July, 2009, I served a true and correct copy of this Objection to Plaintiff's Emergency Motion to Seal Documents and for Protective Order:

AFRA – via e-mail to William O. Tower	William O. Tower – via e-mail
Leonard Henderson – via e-mail	Susan Adams Jackson – via e-mail
Cletus Kiefer – PO Box 52, St. Charles, MO 63301	Families at Risk Defense Alliance – via United States Mail to PO Box 52, St. Charles, MO 63301
Francine Renee Cygan – 329 Cornell Ave., Apt. D, Villa Park, IL 60181	Mark Cygan – 329 Cornell Ave., Apt. D, Villa Park, IL 60181
Illinois Family Advocacy Coalition – c/o Renee Cygan	Sarah Thompson – via e-mail to Daniel Slater, Esq.
Desere' Clabo aka Howard – via e-mail to Daniel Slater, Esq.	Dennis Hinger – via e-mail
Sarah Thompson – via e-mail to Daniel Slater, Esq.	Aimee Dutkiewicz – 40 Landry St., #2, Bristol, CT 06010
Thomas Dutkiewicz – by e-mail	Connecticut DCF Watch – by e-mail
William Wiseman – via e-mail	Wiseman Studios – via e-mail
Ann Durand – via e-mail	Brenda Swallow – via e-mail
Kathy Tilley – 800 Gibson Dr., #322, Roseville, CA 95676	Randall Blair – via e-mail
Lloyd Phillips – 14220 SW 29 Court, Ft. Lauderdale, FL 33330	Ringo Kamens – via e-mail
Cheryl Barnes – via e-mail to Daniel Slater, Esq.	CPS Watch, Inc. – via e-mail

and upon the Plaintiff, Suzanne Shell, via U.S. Mail.

Dated: July 7, 2009

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(Mrs.) Dorothy Kernaghan-Baez