

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MICHAEL ZWEBNER,)
)
 Plaintiff,)
)
 v.)
)
 JOHN DOES ANONYMOUS)
 FOUNDATION, INC., a corporation, and)
 LES L. FRENCH,)
)
 Defendants.)

Civil No. 00-1322-KI

STIPULATED INJUNCTION

Michael Zwebner and Les L. French, having reached a negotiated settlement of all their claims against each other, part of which includes the entry of a stipulated injunction against both of them, hereby stipulate to the entry of this injunction:

Les L. French and Michael Zwebner shall not make any statements about the other, whether they are true or not, in any medium, directly or indirectly, under any alias, to any person or entity. Likewise, neither French nor Zwebner shall cause any other person to make any statements about the other in any medium. The prohibition applies to written, oral, or electronic statements or communication of any kind, without limitation. In interpreting the extent of the prohibition, the court shall be required to construe it as broadly as possible. All innuendoes will be interpreted as referring to the other party if any interpretation leads to that conclusion in the court's opinion.

The parties further agree that should either of them be asked anything by anybody about the


other, they shall only respond that they are not at liberty to make any comment and can only refer the inquiring party to the injunctive order entered in this proceeding. The only permitted statement will read:

I am not at liberty to make any comment. If you want an explanation, you are referred to the injunction entered by the U. S. District Court of Oregon in the case of Zwebner v. French et al, Case No. 00-1322-KI.

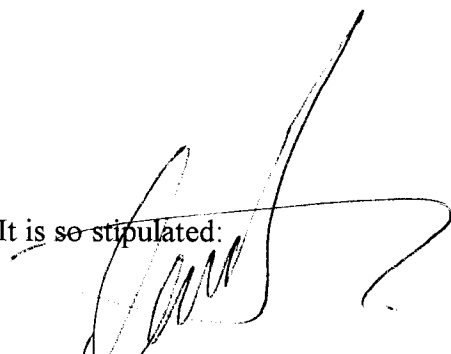
If there is a violation of this injunction by either Zwebner or French, the parties agree that the court shall impose a civil contempt penalty in the amount of \$50,000.00 for each such statement that is made, to be paid by the violator to the other party. The penalty is the same regardless of the form, content, or means utilized to make the statement. Any such violation shall accrue interest at the rate money judgments entered by the District Court at the time of imposition of each such penalty would accrue, until paid.

This injunction shall be in force for 5 years from the date it is entered on the court's docket, and shall automatically dissolve on the next day.

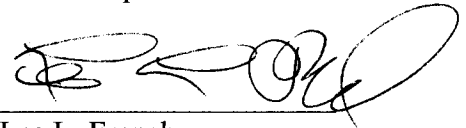
Dated this 20 day of ~~April~~ ^{MAY}, 2003.



Garr M. King
United States District Judge

It is so stipulated:


Michael Zwebner
March 31 st / 03
Date

It is so stipulated:


Les L. French
March 31, 2003
Date