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FILED
Superior Court of California
County of Riverside

12/14/2016
bmiller

By Fax

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF RIVERSIDE**

11 JOHN HERRIOT, an Individual,

12 Plaintiff,

13 vs.

14 DEAN MCADAMS, an Individual;
15 and DOES 1-20, inclusive.

16 Defendants.

) CASE NO.: PSC1606342

) Assigned for all purposes to:

) Dept.: PS2

) DECLARATION OF ALVIN B. SHERRON
) IN SUPPORT OF PLAINTIFF'S *EX PARTE*
) APPLICATION FOR A TEMPORARY
) RESTRAINING ORDER ENJOINING
) DEFENDANT DEAN MCADAMS
) AND ORDER TO SHOW CAUSE RE
) TEMPORARY RESTRAINING ORDER

) Hearing Date: December 15, 2016

) Hearing Time: 8:30 a.m.

) Department: PS2

DECLARATION OF ALVIN B. SHERRON

I, Alvin B. Sherron, hereby declare and state as follows:

1. I am the attorney for Plaintiff John Herriot in the above-captioned matter and make this declaration in support of Plaintiff's *ex Parte* Application for a Temporary Restraining Order Enjoining Defendant Dean McAdams ("Defendant McAdams") from posting any and all writings, printings, pictures, effigy or other fixed representation to the eye which exposes plaintiff to hatred, contempt, ridicule, or disgrace or which causes plaintiff to be shunner or avoided, or which has a tendency to injure plaintiff in his occupation.

2. That original counsel retained by Plaintiff John Harriott was Parker Stanbury, LLP, of Los Angeles, California.

3. That on November 15, 2016, Attorney Marcus Bastida, of Parker Stanbury, LLP, Los Angeles, California wrote a letter to Defendant Dean McAdams, demanding that McAdams cease and desist from posting on the internet defamatory and private matters about Plaintiff. A copy of the correspondence of November 15, 2016 correspondence authored by Attorney Bastida is attached hereto as Exhibit "A."

4. That in response to Attorney Bastida's correspondence Defendant McAdams sent a written response a copy of which is attached hereto as Exhibit "B." Therein Defendant McAdams made mockery of the demand letter and paid it no attention whatsoever despite the warnings of possible criminal prosecution including jail time and or fine.

5. That from the content of Exhibit "B" it appears that Defendant McAdams makes it a practice of posting false and damaging postings on internet sites such as "Legal Noodle" about anyone or any lawyer doing their duty to assist Plaintiff in getting the websites removed.

6. That my research has revealed that Plaintiff is in fact on the list of Megan's Law website for acts committed by him many years ago. That despite this posting Plaintiff is entitled to protection under the law pursuant to unless Defendant McAdams is using information on the website to protect a person at risk. Here Defendant McAdams is using the information on the Megan's Law website to destroy the Plaintiff financially, mentally, spiritually and socially.

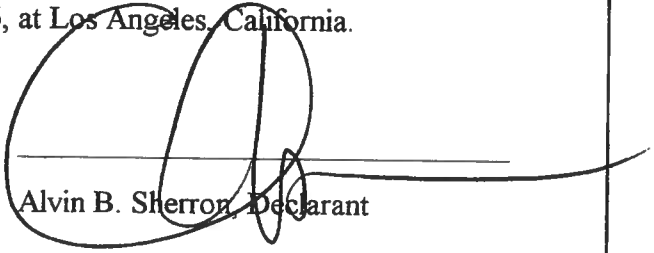
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1 the Memorandum of Points and Authorities in support of Plaintiff's Ex Parte Application for a
2 Temporary Restraining Order are punishable pursuant to California Penal Code Section 290.46,
3 subparagraph (j).

4 That Defendant McAdams is defiant despite the demand letter and warnings sent to him
5 on November 15, 2016, and has instead made a mockery of Attorney Bastida's letter and the laws
6 of our great state.

7 I declare under the penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct to the best of my knowledge and belief and that if called to testify I
9 would and could competently testify as to the same herein.

10 Executed this 14 day of December 2016, at Los Angeles, California.

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14 Alvin B. Sherron, Declarant