

FILED

10 AUG 2011 10:33 am

Civil Administration

N. MONTE

EXHIBIT 8

Dominic J. Morgan
PO Box 1011
Marlton, NJ 08053
610-364-3367

June 13, 2011

Leon Silverman
230 So Broad St. 17th Floor
Philadelphia, PA 19102

RE: Nevyas v. Morgan, et al
Philadelphia CCP: November Term, 2003; No. 946

Mr. Silverman,

In response to your letter dated June 7, 2011:

With my visual impairment and legal blindness, there is no way I could possibly do what you ask concerning the 25 statements in five days, even if indicated for limited purpose public figures like your clients.

You distort and misrepresent facts, including pleadings, trial testimony, exhibits, and the findings of fact, conclusions of law, and orders of the Honorable Victor J. DiNubile, Jr. (on March 16, April 6, April 28, and June 6, 2011).

All 25 statements were first published after the July 30-August 1, 2003 Agreement and before the July 26, 2005 trial and order by the Honorable Eugene Maier, and were removed until Judge Maier's order was reversed in part March 9, 2007 by the Superior Court.

At trial on remand, Judge DiNubile evaluated my websites, which included all 25 statements, and did not award damages for defamation

because he found no defamation after the July 30-August 1, 2003 Agreement. For each of the 25 statements at trial, you either (whichever) lost your argument, or never argued or never even sought to argue, and you did not mention them in your post-trial motion. Not only are all 25 statements true, but the statute of limitations to complain about the 25 statements has long expired; and I have added nothing to my websites since trial.

Insofar as statement #20, misrepresenting court orders - one example: On November 17, 2003 Judge Sylvester denied your request for a preliminary injunction. So you, an officer of the court, wrote my internet carrier, Discount Domain Registry, Inc., who you had been threatening to sue if they did not shut my website: "[Y]ou told me that unless the judge gave approval to the content of the website 'lasiksucks4u.com,' you would remove the website. The judge did not approve the website." This misrepresentation, under false color of state action, led to shutting my website and dissemination of password-protected material, violating my free speech rights.

Now you misrepresent Judge DiNubile's injunction, which is based on the Superior Court's holding that the July 30-August 1, 2003 Agreement precluded future publication of certain statements *related to my website as of July 30, 2003*, and for which Judge DiNubile cited specific examples (none of the 25 statements). Judge DiNubile's injunction does not:

(1) preclude my "... right to make, if he [Morgan] so chooses and at his own risk, libelous statements in the future, unrelated to the statements on his website as of July 30, 2003." *Nevyas v. Morgan*, 2007 PA Super. 66 at ¶30

(2) characterize as future publication these 25 statements first published before 2005, or re-set the statute of limitations

Sincerely,

A handwritten signature in black ink, appearing to be 'DJ Morgan', with a long horizontal line extending to the right.

Dominic J. Morgan

Dominic J. Morgan
PO Box 1011
Marlton, NJ 08053
610-364-3367

June 22, 2011

Leon Silverman
230 So Broad St. 17th Floor
Philadelphia, PA 19102

RE: Nevyas v. Morgan, et al
Philadelphia CCP: November Term, 2003; No. 946

Mr. Silverman,

In response to your letter dated June 21, 2011, which repeats your June 7, 2011 letter, I repeat below my June 13, 2011 letter:

In response to your letter dated June 7, 2011:

With my visual impairment and legal blindness, there is no way I could possibly do what you ask concerning the 25 statements in five days, even if indicated for limited purpose public figures like your clients.

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