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**SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY**

HOPE CAPITAL LLC/SARAH HOPE

Name of Plaintiff

Case Number: CV2023-054527

Vs.

**Title: EMERGENCY MOTION FOR
CEASE AND DESIST AND
TAKEDOWN ORDER**

AMANDA WILSON

Name of Defendant

Plaintiff hereby submits this MOTION on December 8, 2023 against Defendant(s) and alleges the following:

Introduction

1. The Plaintiffs, Sarah Hope and Hope Capital LLC (collectively "Plaintiffs"), respectfully submit this Motion for an Emergency Cease and Desist and Takedown Order against Defendant Amanda Wilson ("Defendant").
2. This Motion is made in connection with the ongoing Civil Court Case No. CV2023-054527 and Injunction Against Harassment Case No. 2023-018490, filed on November 27, 2023 and served to Amanda Wilson.

Factual Background

1. Plaintiffs filed a civil lawsuit against Defendant for Slander, Libel, and Defamation on November 27, 2023.

2. Subsequent to the filing, Defendant launched a website, [protectmyself.me], containing false and defamatory statements about Plaintiffs, including unfounded allegations of Medical Claim Fraud.
3. The website unlawfully discloses Personal Identifiable Information (PII) and Protected Health Information (PHI) in violation of privacy laws, including HIPAA.
4. The website has several videos made by Amanda Wilson without the consent for Hope Capital LLC. Hope Capital LLC did not authorize realize of the videos.
5. Defendant's actions have caused and continue to cause irreparable harm to Plaintiffs' reputation and business operations.

Legal Basis

1. Plaintiffs seek an emergency court order for the immediate removal of the defamatory content from the website and to enjoin Defendant from further publishing such content.
2. Plaintiffs assert that the statements made by Defendant on the website are false, defamatory, and have caused significant harm to Plaintiffs.
3. The unauthorized disclosure of PII and PHI by Defendant is in clear violation of applicable privacy laws and regulations.
4. Plaintiffs request that the Court order the website host, GoDaddy, to take down the website [protectmyself.me] as part of the relief granted.

Relief Sought

Plaintiffs respectfully request the Court to:

- a. Grant an emergency hearing to consider this Motion.
- b. Issue a Cease and Desist Order against Defendant, prohibiting further defamatory publications against Plaintiffs.
- c. Order the takedown of the website [protectmyself.me] hosted by GoDaddy and now allow Defendant to post any information about Plaintiff on any website, social media site like Facebook, LinkedIn, Instagram or any other publicly accessible site.

d. Grant any other relief the Court deems just and proper.

Conclusion

Due to the urgent nature of the harm being caused by the defamatory statements and the unlawful disclosure of sensitive information, Plaintiffs respectfully request expedited consideration of this Motion.

Respectfully submitted,

Sarah Hope, Signature, Pro Se

SARAH HOPE, Representative for Hope Capital LLC

SARAH HOPE, Personally

40118 N Courage Way, Anthem AZ 85086

sarahhopeaz@gmail.com/602-300-2620

Dated this 12/7/23.

Sarah Hope, signed electronically online

(Signature of Plaintiff or Plaintiff's Attorney)