

PRESENT: ~~HON. KAREN B. ROTHENBERG~~
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

RUZILYA KHUSNUTDINOVA,

Plaintiff,

- against -

VLADIMIR DRANOVSKY, and
PRIMAL VENTURES, INC., and
PAUL J. BROWN,

Defendants.

At (IAS Part 72 of) the Supreme Court of the State of New York, County of Kings, held at the Courthouse, located at 360 Adams Street, Brooklyn, New York on the 23RD day of OCTOBER, 2012

Index No.: 20350/2012

**ORDER TO SHOW CAUSE
IN A CIVIL ACTION**

Upon filing the affidavit of Plaintiff **RUZILYA KHUSNUTDINOVA**, sworn to on the 16th day of October, 2012, and upon affirmation of attorney **Alena Shautsova**, and exhibits attached to the affidavit: copies of newspaper publications, and copies of website pages containing the information, to wit: "the profile" at issue;

Let the Defendants **PRIMAL VENTURES, INC.** and **PAUL J. BROWN** or their attorney show cause at IAS PART 43, Room 761, of this Court, to be held at the Courthouse located at 360 Adams Street, Brooklyn, NY., on the 13th day of NOVEMBER, 2012, at 9:30 o'clock in the FORE noon or as soon as counsel may be heard why an order should not be made

- (A) granting a temporary restraining order enjoining the Defendants **PRIMAL VENTURES INC.** and **PAUL J. BROWN** from operating and publishing the website www.escortsexguide.com to the world wide community during the pendency of this proceeding; and,
- (B) directing the webmaster of www.escortsexguide.com to de-activate the website during the pendency of this proceedings; and

KINGS COUNTY CLERK
FEE PD \$ 45.00
[Signature]

- (C) directing search engines such Google, Yahoo, Bing, Ask to remove the content of Plaintiff's profiles and pictures from the search engines database; and
- (D) directing the domain name operator ENOM.com to deactivate the www.escortsexguide.com; and
- (E) granting a temporary restraining order enjoining the Defendants PRIMAL VENTURES INC. and PAUL J. BROWN from the publishing, distributing and keeping in the active form (form accessible to the public on the Internet) any and all information on their websites, including, but not limited to the website www.escortsexguide.com, and its directories, pages, and links, pertaining to Plaintiff in this action, and/or information through which Plaintiff can be reasonably identified, and/or the following pages specifically:
- a) http://escortsexguide.com/profile.asp?checkloc=false&escid=7435
- b) http://www.escortsexguide.com/profile.asp?checkloc=false&escid=7434; and
- (F) granting a temporary restraining order enjoining **all** Defendants and their representatives and agents from providing statements regarding this case to the representatives of newspapers, magazines, talk shows, and other public information channels; and
- (G) directing Defendants PRIMAL and BROWN to remove cached items relating to the information described in (E) above; and
- (H) for such other and further relief as this Court deems just and proper.

FOR THE REASONS THAT

Defendants PRIMAL VENTURES INC. and PAUL J. BROWN despite repeated requests to take down Plaintiff's profile and pictures continue to display them on their

website www.escortsexguide.com, and continue to cause Plaintiff damages; and upon information Defendant DRANOVSKY is intending to appear on several TALK shows and give interview to public media channels of the United States and foreign.

SUFFICIENT CAUSE APPEARING THEREFORE, LET service of a copy of this Order, ^{INCLUDING THE SUMMONS & COMPLAINT} together with the papers annexed hereto, on Defendant DRANOVSKY or his attorney by personal service, and on Defendants PRIMAL VENTURES INC. and PAUL J. BROWN or their attorney, by personal service or by ^{PERSONAL SERVICE} [REDACTED] on or before **OCTOBER 31ST**, 2012 be deemed good and sufficient.

An Affidavit or other proof of service shall be presented to this Court on the return date directed in the second paragraph of this order.

[REDACTED]

ENTER:

J.S.C.



HON. KAREN B. ROTHENBERG