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4 Defendant

5 UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

9 **TELUS Corporation, a foreign
corporation,**
10
11 **Plaintiff,**
12
13 **DENNIS WATSON, an individual,**
14 **Defendant.**

Case No.: C07-3434 (VRW)
DEFENDANT'S REPLY BRIEF
In Support of His
MOTION TO DISMISS
AND MOTION TO STRIKE

15 **Reply Brief**

- 16
- 17 1. In Mr. Lopez's Opposition Brief he claims that my concerns about jurisdiction are
18 without merit and that both subject matter jurisdiction and personal jurisdiction are
19 appropriate in a San Francisco court. Yet he concedes that his client, TELUS,
20 maintains it's principle place of business in British Columbia, Canada which is clearly
21 outside the jurisdiction of this Court and District as am I. This court and this District
22 cannot possibly hold personal jurisdiction. Since Mr. Lopez refuses to separate the
23 two, his application must be dismissed.
- 24 2. He then he boldly lies again. I never posted any video on Youtube that had anything
25 to do with TELUS' Voice over Internet Protocol. That is a bold face lie. I have
26 submitted to the court a copy of TELUS Idol. I have submitted to the court news
27 reports of TELUS Idol. I posted exerts from TELUS Idol on Youtube. They had those
28 exerts from TELUS Idol taken off Youtube as well as several other videos that his
client holds no possible copyright claim on. That is fraud.
3. Yes the penalty for Fraudulent Copyright Notice under section 506(c) of the US
Copyright act is frivolous. It should be much more. Nevertheless, my case is far from
frivolous as he erroneously claims. This is how wars are started. Do I have to contact
the American Civil Liberties Union? Do I have to contact Michael Moore? Do I have to
send a convoy of picketers to San Francisco to petition the government for a redress
of this grievance? How long can justice sleep?

- 1 4. Putting a false statement in bold caps does not make it a true statement. Neither
2 does submitting 35 irrelevant pages of nonsense. The fact is found in the plaintiff's
3 initial application. They called TELUS Idol TELUS VOIP. The fact is found in Mr.
4 Lopez's opposition brief where he lies again and claims I posted a video about VOIP
5 on Youtube when I never have. Ever. Lying in an application is a violation of Rule 11.
6 Rule 11 is not frivolous. His contempt for the rule is criminal.
- 7 5. In Mr. Lopez's Affidavit in Opposition he brags about being a partner with the law firm
8 Thelen Ried Brown Raysman & Steiner LLP. That simply means he should know
9 better and has no excuse. Unethical behavior cannot go unpunished.
- 10 6. I am an unrepresented former postal worker from Canada. If I make a technical error
11 in any of my replies, I would thereby have an excuse. Since Mr. Lopez is a partner in
12 a U.S. law firm he has no excuse. A lie is a lie and it is unethical. My motion is clearly
13 supported by the facts. Mr. Lopez's application is only supported by fiction to which
14 he asks the court to accept as fact solely because he is a partner in a law firm and I
15 am unrepresented. Lawyers and politicians can't lie?
- 16 7. Section A of his opposition brief correctly asserts that this court has jurisdiction over
17 copyright in it's district. Yet the law states that if I have little or no dealing with the
18 district the application was filed in, that in itself is grounds for dismissal.
- 19 8. Section B of his opposition brief claims this court has personal jurisdiction because I
20 consented to it in my counter notification, which he claims was defective. If it is
21 defective then it can't be used then can it. Nevertheless, any contract law states one
22 must understand what one is signing. I clicked a button on the Internet, which created
23 a computer generated generic form. I did not get legal counsel before signing that
24 form. My amended notification was clear.
- 25 9. After I saw their absurd application I made it very clear exactly what I was consenting
26 to. I was consenting to the jurisdiction of this court for the Youtube dispute so I could
27 get the videos they had fraudulently removed replaced. If they want to sue me
28 personally they must do it in Canada. That makes this clearly the improper venue for
personal jurisdiction.
10. It is somewhat ironic that Mr. Lopez would cite the U.S. Constitution. The First
Amendment surpasses his entire application. Actual Malice is not saying something
that is true. I made a true report on TELUS idol and he wants to censor that report
from the Internet. That is the root of this case.
11. Section D states that my claim that I was not properly served is false. What is the
politically correct term for a false accuser? They did not serve me a copy of their initial
application. Period. I asked for a copy from Youtube and filed my response. AFTER I
filed my response objecting to an ex parte application proceeding in my absence
THEN they served me their application. Likewise they did not serve me a copy of
Judge Walker's Order calling for a Case Conference until AFTER the second date for
a Case Conference. I filed a request for a telephone appearance to an ADR
conference because that is what I was told it was. Those are the facts.

- 1 12. In Mr. Lopez's Affidavit in Opposition Exhibit A, Inclusion 2, pages 5-11 lists some of
2 the videos they had taken off Youtube which would correspond to my Exhibit E (i-v)
3 respectively. Theirs was put together by Mat Wilcox. There are errors in it. My Exhibit
4 E is an accurate list.
- 5 13. You will note that none of those videos make any reference to TELUS VOIP
6 whatsoever. He changed the name of the first video to TELUS TV Boot Procees. That
7 was not the name of any of the videos and they had nothing to do with TELUS TV
8 whatsoever. This is another lie and another defiant violation of Rule 11 because I
9 failed to file a Rule 11 complaint on a separate piece of paper. A technical flaw I ask
10 Judge Walker to over look due to the fact that I am unrepresented.
- 11 14. "TELass Scab Training" and "TELass Scabs and Security" was never a title of any of
12 the videos I posted. Here Mr. Wilcox, likely from the Wilcox Group, lies and falsely
13 implies I made a slur towards replacement workers. I never used the term TELass on
14 any of the Youtube videos. Ever. You will note that my username listed under "From"
15 on Mr. Wilcox evidence is Finianisback. Those two videos were posted by someone
16 else with the username blkjak. I do not know who that username is and I certainly did
17 not post those videos. The fraud and Wilcox spin on the truth is never ending. TELUS
18 TV Boot Process video in their list was also another username as shown in their own
19 evidence. That was jOly. I have no idea who that is and I have never posted any
20 videos on Youtube under that or the other blkjak username.
- 21 15. Conrad Black was a famous Canadian corporate criminal who had to be tried in the
22 United States because the Canadian laws need to be reformed. They let corporate
23 criminals get away with crime here in Canada. TELUS is a prime example. Yet in
24 Canada, perjury is perjury and in the United States Rule 11 does have merit.
- 25 16. Since Mr. Lopez refuses to acknowledge my Motion to Strike from his application the
26 frivolous wish list that goes far beyond the jurisdiction of a San Francisco court, this
27 court is then forced to dismiss his application. His application is flawed. If he refuses
28 to correct the flaw, his application must be dismissed. I completely object to Mr.
Lopez's proposed order. To sign that order would be a crime worthy of Conrad Black.
The McLibel case law from an International court stands.

22 Dated: Feb 29, 2008

By Dennis Watson - Defendant