

IN THE HIGH COURT, QUEEN'S BENCH DIVISION
ROYAL COURTS OF JUSTICE

CLAIM NUMBER _____

BETWEEN

SAMUEL COLLINGWOOD SMITH

CLAIMANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'LIKEICARE'

1st DEFENDANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'KIWINULL'

2nd DEFENDANT

AND

UNKNOWN DEFENDANTS, OPERATORS OF WEBSITE
ENCYCLOPEDIADRAMATICA.SE

3rd DEFENDANT

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N/A

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N/A

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Essential reading 12 A4 sides - the Claim Form A1-A2, Particulars A3-A6, Application Notice A43-A44 Statement SS1 D1-D4.



Claim Form

In the HIGH COURT, QUEEN'S BENCH	
A1	
Fee Account no.	
For court use only	
Claim no.	
Issue date	

You may be able to issue your claim online which may save time and money.
Go to www.moneyclaim.gov.uk to find out more.

Claimant(s) name(s) and address(es) including postcode
Samuel Collingwood Smith
11 By the Mount
Welwyn Garden City
Hertfordshire
AL7 3SY



Defendant(s) name and address(es) including postcode
Persons unknown, users of the website <http://EncyclopaediaDramatica.se> - 'Likeicare' and 'KiwiDynastia'.
Also the operator of the website. Defendant(s) refused to give an address, responding to a polite complaint, S5 Notice and Letter of Claim, with "LOL DONT CARE FAGGOT, GO FOR IT". An application to serve by email and if necessary, outside the jurisdiction, accompanies this form.
Brief details of claim

Claimant seeks damages and an injunction for defamation because the Defendant(s) published an article about him to state, "Samuel Collingwood Smith is a Pedophile and Child Rapist" and other similar statements. Malicious defamation or in the alternative ordinary defamation is alleged per the particulars. Defamation claims must be issued in the High Court.

Value

The claimant seeks £10,000.

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Royal Courts of Justice, the Strand

Defendant's name and address for service including postcode

Unknown

An application to serve online and outside the jurisdiction if necessary accompanies the claim form.

	£
Amount claimed	10000
Court fee	500
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Does, or will, your claim include any issues under the Human Rights Act 1998? ☒ Yes ☐ No

Particulars of Claim ~~(attached)(to follow)~~
Attached.

Statement of Truth

~~*(I believe)(The Claimant believes)~~ that the facts stated in these particulars of claim are true.

~~*I am duly authorised by the claimant to sign this statement~~

Full name SAMUEL COLLINGWOOD SMITH

Name of claimant's legal representative's firm N/A

signed Sam Smith position or office held N/A

~~*(Claimant)(Litigation friend)~~

(if signing on behalf of firm or company)

~~(Claimant's legal representative)~~

**delete as appropriate*

Samuel Collingwood Smith
11 By the Mount
Welwyn Garden City
Hertfordshire
AL7 3SY

Claimant's or claimant's legal representative's
address to which documents or payments
should be sent if different from overleaf including
(if appropriate) details of DX, fax or e-mail.

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PARTICULARS OF CLAIM

The Parties

1. The Claimant is a former Borough councillor in his own area of Welwyn-Hatfield and is currently studying as a weekend student for an LL.M LPC (Master's in Law with Solicitor's Certificate). I have been praised by judges, including Mostyn J, for my charitable activities as a McKenzie Friend. For example, Mostyn J thanked me for my 'sensible' and 'reasonable' submissions.
2. The Defendants are users and also the operators of the website EncyclopediaDramatica.se (ED). ED is a purportedly satirical website, which uses the same encyclopedia (wiki) software as well known website Wikipedia.
3. Because of complaints and controversy, the site takes steps to anonymise itself, for example it uses a service called Cloudflare that acts as a proxy and hides the country it is in and the real IP address of the servers it is hosted on. Editors and staff use pseudonyms. A previous, UK based administrator was arrested on convicted as a member of hacking group Lulzsec.
4. Whilst it is satirical, much of what ED says is accurate and this accounts for its popularity. The site has exposed genuine wrongdoing and other material of interest. So whilst the site is purportedly satirical what it says is often believed – it is much like a more vulgar online Private Eye magazine.

Events and Publication Complained Of

5. For some time there has been an article about me on ED. In essence it called me a zealot in child protection matters because of a blog I operate (MatthewHopkinsNews.com), which

deals with case law and sometimes child protection matters. I did not consider the original article objectionable but rather legitimate satire.

6. Between 10 May 2016 and 12 May 2016 users of the site known as 'KiwiDynastia' and 'Likeicare' (an Administrator) amended the article to state that, "*Samuel Collingwood Smith is a Pedophile and Child Rapist*" and variously that I was a paedophile and child rapist. The version at the time of writing is attached as Annex I per PD 53 2.2 (1).
7. I set out the specimen words complained of and the defamatory meanings imputed below as follows to comply with PD 53 2.3 (1) (a) -
8. "*KNOWN CHILD MOLESTOR*" to which I impute the meaning that I am a child molestor – one who commits sexual offences against children
9. "*His salivating lust for young ass is apparent*" - to which I impute the allegation that I am attracted to children
10. "*<Vordrak> i love being able to violently mouth fuck my own mother and she forgets it 5 minutes later*", which is a purported internet chat log to which I impute the meaning that I sexually abuse my mother.
11. The heading "*Samuel Collingwood Smith is a Pedophile and Child Rapist*" to which I impute the facial meaning, and everything below it, which includes a falsified internet chat log in which I am depicted to claim that I enjoy child pornography and seeing children hurt. It is actually a real log of another individual referred to on their site with my username falsely substituted in.
12. All of the above factual imputations are denied. I have no criminal convictions, cautions or even warnings for (for example, 'child rape'). I did once receive a police information notice for harassment, but it was officially rescinded when I complained because an investigation revealed my actions were lawful. The police apologised and I have a completely clean record. Also the alleged victim was an adult.
13. I believe the authors of the defamatory statements are retaliating because of an article I wrote. Recently I was tipped off that a website operated by a friend of theirs, <http://kiwifar.ms> was hosting child pornography. When I complained to the site's hosting company, they confirmed it was true and banned the site. The matter is now being investigated by UK and US police. Kiwifar.ms has subsequently sprung up again but been moved by other hosts on several times.
14. The person going by KiwiDynastia uses the name on several sites and I recently caught him in the *actus re* of sending a photograph of his penis to a Twitter hashtag used by minors. I reported him to police, who are investigating and this is likely to be part of his motivation. I also wrote an article about it.

Pre-Action Conduct

15. On 13 May 2016 I discovered the changed article and complained politely. The usual way to complain on a Wiki is to write on the talk pages of officials. I posted my complaint to several of the highest officials of the site, known as Bureaucrats.
16. I received a prompt reply from an administrator, 'Likeicare'. The reply was delivered on my own talk page and stated, "*fuck off lol*". Another administrator 'DarkLordTR' amplified

stating that if I continued in my course I would be banned and they would see to it that my article came high up in the Google page rankings.

17. I responded with a notice under S5 Defamation Act 2013 and also a letter before claim posted again to the talk pages of the Bureaucrats and my own talk page. I received a response, again delivered by the administrator 'Likeicare'. The S5 notice was served at 00:08 14/05/2016 and therefore expired at 00:08 on 16/05/2016.
18. The response to the Letter of Claim and S5 Notice was -
19. ****OFFICIAL RESPONSE FROM MYSELF, AND ON BEHALF OF KIWIDYNSATIA AND ENTIRETY OF ED STAFF****
LOL DONT CARE FAGGOT, GO FOR IT
20. This was centred and in bold. Other administrators and bureaucrats logged on but did not demur. After the response, I found myself unable to respond on the site and it displayed a montage of revolting gory and sexual images. I believe this is used for banned persons.
21. I do not know the real world identities of 'Likeicare' and 'Kiwidynastia'. It has been suggested that Likeicare is called 'Chris Jones' and lives in Australia but I do not know if this is true.
22. There is one mistake in the letter of claim, I stated that I might apply to increase the amount of damages sought once the anonymous people had been identified. I have since discovered this is not allowed per *Lewis v Hadaway* [2015] EWHC 3503 so I will not make any such application and will live with the amount on the claim form, barring further wrongdoing by the Defendants after issue. By the time I realised this, I had discovered the Defendants' anonymised email addresses on the site, and sent a correction to them also.
23. A copy of the pre-action exchange is appended at Annex II, including the correction.

Malice

24. On the basis of the facts above, I assert that the Defendant was motivated by malice. If that fails, I allege ordinary defamation.

Serious Harm – S1 Defamation Act 2013

25. Encyclopedia Dramatica is a publication which is often believed and the allegations it frames in this case are amongst the most serious crimes known in this jurisdiction. It is evident that the allegation has the potential to cause serious harm. If you Google my name, "*Samuel Collingwood Smith*" at the time of writing it is the first result. As employers often Google the names of potential employers now, this most likely will make many unwilling to employ me. It will most likely make some social acquaintances unwilling to socialise.

Jurisdiction – S9 Defamation Act 2013

26. The perpetrators of the defamation complained of purposely obscure their locations and are in any event in multiple jurisdictions. The damage and the tort are here because this is the only place where I seek employment or have any reputation *per se*. A key remedy is likely to be an order prohibiting the repetition of the allegations.
27. The Court's attention is drawn to *Sloutsker v Romanova* [2015] EWHC 545 (QB) and in particular paragraph 69 regarding the fact that the gravity of an allegation is a factor that supports engaging the jurisdiction of the English courts.

28. At Annex III I have attached an Alexa.com report for the website. Alexa is a service that measures page popularity. Alexa says that 49.5% of ED's traffic is from the United States where it has 361,880 unique visitors per month. 10.1% is from the United Kingdom and that means 73822 unique visitors per month in the UK. That is a real and substantial tort being committed here.

Human Rights Issues – Human Rights Act 1998

29. The allegations made and their prominence engages my Article 8 rights. It is trite law that Article 8 encompasses both work and relationships. Willingness to employ me or indeed relate to me is likely to be severely impaired by these allegations and any failure to provide a remedy in this jurisdiction.

Website Operator Immunity – S5 Defamation Act 2013

30. The website operator's official response to my complaint was, 'fuck off' and the response to the s5 notice and letter of claim was, 'LOL DONT CARE FAGGOT, GO FOR IT'. Firstly, I submit the court should take that as a 'failure' to respond under s5 (3) (c). In any event the time limit has now expired. In addition, the response is obviously malicious and so s5 (11) is engaged.

Particulars of Loss

31. The potential losses in this case are greater than the actual losses. As I believe that the Defendants are likely to be impecunious, I have plead this claim at £10,000 because of the issue fee, which may not be recoverable.
32. Of the £10,000 sought, £9,000 reflects hurt feelings and £1,000 sought is aggravated damages. The factual basis for this is the childish and threatening response to the polite initial complaint and the letter of claim.
33. The claimant seeks interest 8% under S35A Supreme Court Act 1981 on any damages.
34. The total damages sought on present knowledge are £10,000.

Equitable Remedies

35. A permanent injunction restraining further publication and requiring the publication complained of to be removed. Even if the Defendants are outside the jurisdiction this is likely to be beneficial to me because other more reputable institutions will act on it. For example, Google policy would be to de-list the site.

Costs

36. Because of the response to the letter of claim, costs are sought on the indemnity basis, even if a later challenge to jurisdiction or other defence is raised.

Statement of Truth

I believe that the facts stated in these Particulars of Claim are true.

Sam Smith

Signed

Date 15/05/2016

To the Defendants
To the Court

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ANNEX I TO PARTICULARS OF CLAIM

This is the document referred to as 'Annex I' in the Particulars of claim.

Signed



Date 15/05/2016

Vordrak

From Encyclopedia Dramatica



"[This article is] quite funny actually. The surprising level of detail makes me feel important."
(<http://www.webcitation.org/6a4fx7PqZ>)

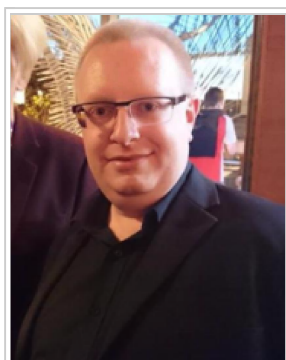
Inserting details improves Vordrak's self-esteem. Please add more details and surprises. Vordrak's happiness depends on it.

Note: this is an article about an Encyclopedia Dramatica user. For more information, please see the appropriate user page. To leave this user a message, please visit their talk page.



THIS PAGE IS BEING WATCHED BY ENEMIES OF THE LULZ.
BEWARE OF BUTTHURT REVISIONISM.

Samuel Collingwood Smith, aka **Vordrak**, **Matthew Hopkins**, and **MHWitchfinder** (born December 30 (<http://chooseyourstory.com/user/points?username=Vordrak>) , 1978 (<http://www.okcupid.com/profile/Vordrak>)) is a British Conservative politician, activist, **KNOWN CHILD MOLESTOR** and law student who seeks to protect your daughter's precious bodily fluids against pedophiles and liberals, whom Vordrak places in the same category (http://www.whtimes.co.uk/news/storm_over_new_tory_s_baby_rapist_comments_1_13305) . Vordrak operates a blog (<http://matthewhopkinsnews.com/>) named after a Puritanical, genocidal maniac who invented the "duck test" (https://www.youtube.com/watch?v=zrzMhU_4m-g) . The "journalism" contained therein primarily consists of wild claims of pedophilia against political opponents, people who have annoyed him, and random passers-by. Such claims appear to be motivated by his targets' opposition to GamerGate (<https://voat.co/v/KotakuInAction/comments/178908>) , this being Vordrak's means of exemplifying ethics in journalism. His blog contains the word "paedophile" in over 300 pages on a blog with 400 articles. His salivating lust for young ass is apparent.



Vordrak



Vordrak before gaining chubby cheeks.

<Vordrak> i love being able to violently mouth fuck my own mother and she forgets it 5 minutes later

“

—Samuel Collingwood Smith, regarding the caretaker's pension (left) and Dean Shapps (right).



Vordrak flanked by John Dean (left) and Dean Shapps (right).

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Samuel Collingwood Smith is a Pedophile and Child Rapist

A known sexual predator who attended Evanescence conventions to prey on preteen mallgoths, Samuel Collingwood Smith attempts to hide his habitual lust for underage pussy by pretending to hate pedophiles. The British courts secretly covered up his many molestations, as at the time it was already undergoing heavy investigations for paedophilia, and he has remained reclusive ever since.

It is currently unknown if Samuel Collingwood Smith is actively collecting child pornography or even actively raping children. All that is known is that Samuel Collingwood Smith is a sick fuck. He once confessed in a publicly listed, known paedophile IRC channel that he loves pictures of tortured children the most.



Sam Smith



Alright, time to jerk off to some neko shota

2:18 AM

Yeah, I'm fucked up. I know 🙄

I drench my sorrows in masturbation so often that it becomes too hard to get off to heterosexual intercoruse for the sole purpose of reproduction.

```
8:58 AM - Samuel Collingwood Smith: God I feel so guilty about the CP
8:58 AM - Samuel Collingwood Smith: I wish it didn't turn me on to see that shit
8:59 AM - Samuel Collingwood Smith: It's not just regular child porn either, it's hurtcore now
8:59 AM - Samuel Collingwood Smith: I just like to see children suffer :(
8:59 AM - Samuel Collingwood Smith: Oh well, no point in thinking about it too much
8:59 AM - Samuel Collingwood Smith: Time to load up Tor and find some more, lol!
```

The facts:

- Samuel has never mentioned anywhere at any point having a lover.
- Samuel was stalking Amy Lee from Evanescence at the age of 32.
- Samuel at the age of 37 was looking for someone between 25 and 60 (seriously).
- Samuel was a British politician.
- Samuel has creepy pedo smile.
- Samuel has creepy pedo glasses.

Every single one of these things indicate that Sam is ready, able, and willing to tear up an infant's asshole like wet tissue paper.

Welwyn-Hatfield

Sam Smith was elected to represent Welwyn-Hatfield's Haldens ward in June 2005 (<http://www.welhat.gov.uk/index.aspx?articleid=2054>) . Smith was a member of the Labour party at the time. Smith ceased serving the Council in 2008, and in March 2009, Smith joined the Conservative party

(http://www.whtimes.co.uk/news/ex_welwyn_hatfield_councillor_turns_on_divided_labour_1_22554) and was embraced by Grant Shapps (<http://www.shapps.com/forum/index.php?action=media;sa=item;in=120;asc>) , the Conservative MP for Welwyn-Hatfield.

Within a week after joining Shapps's forum (<http://www.shapps.com/forum/index.php?action=profile;u=1548>) , Smith made headlines (http://www.whtimes.co.uk/news/storm_over_new_tory_s_baby_rapist_comments_1_13305) . Vordrak compared the Liberal Democrats to a lady pedophile for supporting drug reform proposals:

Liberal policy poses a greater threat to our children than [pedophile and rapist] Tanya French does.

Vordrak's comment was deleted, and after receiving media attention, Vordrak apologized (http://www.whtimes.co.uk/news/tory_new_boy_apologises_for_lib_dem_baby_rapist_comparison_1_18565) :

I would like to apologise unreservedly for writing insensitive comments in the heat of debate.

I completely appreciate that it was inappropriate and offensive.

Afterwards, Vordrak rarely posted to shapps.com (<http://www.shapps.com/forum/index.php?action=profile;area=showposts;u=1548>) , and threads about him disappeared (<http://www.shapps.com/forum/index.php?topic=4830.0>) .

"Promoting positivity on evthreads"

Vordrak was an avid Evanescence dork and fanboy (despite his age) (<https://web.archive.org/web/20101230093229/http://evthreads.com/showthread.php?t=17940>) :

Hi guys,

I know many of us think about this but we have never made a thread explicitly for it so ... this is the thread where we plan to make Amy happy.

The goal here is to make Amy feel loved and supported. We each have our own ways of doing this. Some people make videos. My friends and I have organised a campaign team. Others bake cupcakes.

The point of this is for us all to get together and be positive.

My contribution -

- (1) This year I will be trying to make Amy Hartzler happy by -
 - (i) Organising promotion of the new album ...
 - (ii) ... and the muppets CD.



- (iii) Attending some concerts if she has any.
- (iv) Sending her fun silly stuff.
- (v) Promoting positivity on evthreads.

My question to everyone else is ... how will * **you** * be supporting Amy?

(Just to be clear, my buddies and I have other threads going for the band in general and for specific other members. For example, we made a thread about 'The Snobs' regarding Tim's old band. We have lots of nice things planned for the other band members. We have plenty of love to go around. But this thread is about *Amy*.)

Here is Danny's thread for the whole band

<http://www.evthreads.com/showthread.php?t=16322>

(<https://web.archive.org/web/20101230093229/http://www.evthreads.com/showthread.php?t=16322>)

Here is 'The Snobs' thread for Tim.

<http://www.evthreads.com/showthread.php?t=17623>

(<https://web.archive.org/web/20101230093229/http://www.evthreads.com/showthread.php?t=17623>)

- Vordrak

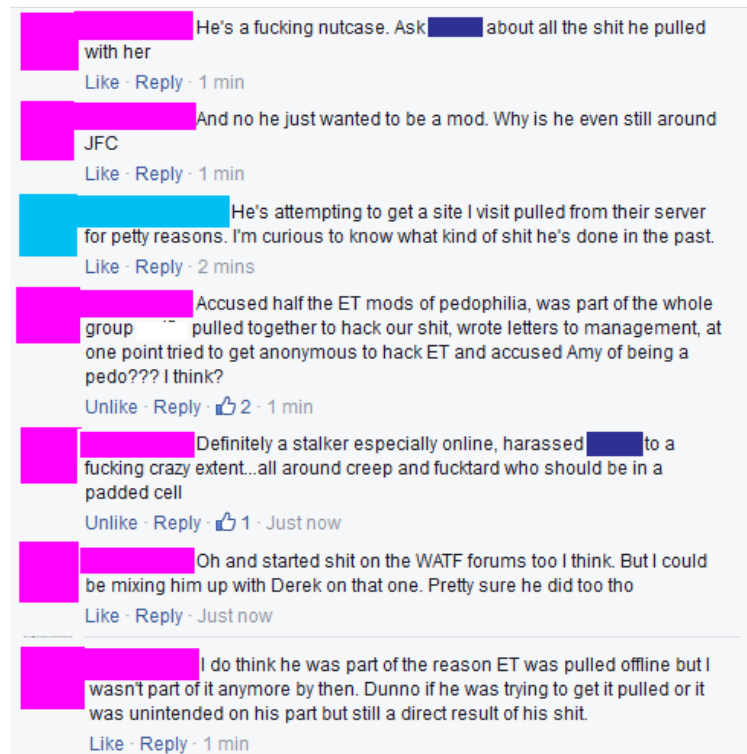


A Photoshop artist's impression of Vordrak.

Vordrak joined Evthreads in February 2009. He became a moderator (<http://www.evboard.com/1263396-post85.html>), but was shocked to learn that he couldn't transform Evthreads into a Puritanical utopia. The site's management didn't allow him to (<http://www.forbes.com/sites/wenjiazhao/2012/07/25/anonymous-targets-singer-and-record-company-in-operation-pedochat/>) take action against self-professed pot smokers or people who published 4chan-esque tales ("paedophile material including a story about sexual offences against a physically disabled male minor") and lolicons ("cartoons with pre-teens in lawful poses but with sexualised captions"). As a true Puritan witchfinder, Vordrak wanted to report these Internet shenanigans to UK authorities, but Amy Lee and her lawyers didn't think that it was such a big deal. Vordrak also seems to take a claim of suicide seriously (<http://www.publications.parliament.uk/pa/cm201213/cmhansrd/cm120717/petntext/120717p0001.htm>), when anyone with a brain knew the claim of suicide was a fake (<http://www.evboard.com/1263396-post85.html>).

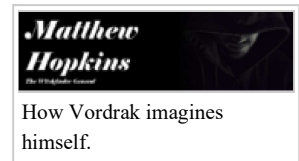
In short, for Vordrak, the Internet is serious business. In 2012, Vordrak used his connections to political leaders to create a petition (<http://www.publications.parliament.uk/pa/cm201213/cmhansrd/cm120717/petntext/120717p0001.htm>) and then used Anonymous as his personal army (<http://archive.is/dKGRR>) ([1] (<https://web.archive.org/web/20140326134114/http://anonnews.org/press/item/1682/comments/>)). This resulted in the closure of Evthreads (<http://www.evboard.com/evthreads-closed-41320.html>).





Matthew Hopkins

In February 2013 (<http://whois.domaintools.com/thewitchfindergeneral.com>) , Vordrak registered the "thewitchfindergeneral.com" domain and started his blog. Despite his 2009 apology



(http://www.whtimes.co.uk/news/tory_new_boy_apologises_for_lib_dem_baby_rapist_comparison_1_18565) , by October 2013, Vordrak was once again trying to link the Left to pedophilia and compared the Left to the Islamic Republic of Iran (<http://matthewhopkinsnews.com/?p=247>) :

The world's children will never be safe from the clutches of the organised left while they exist. The only difference in Iran is that at least the Iranians expect the men to marry the girls first.

In November 2014, Vordrak accused the Left of racism and used Twitter messages as "evidence" (<http://matthewhopkinsnews.com/?p=723>) . Then in January 2015, Vordrak whined about the Holly Fisher meme and compared liberals to children over a Twitter post (<http://matthewhopkinsnews.com/?p=826>) . Again, as in the Evthreads drama, Vordrak takes things said on the Internet far too serious.

GamerGate

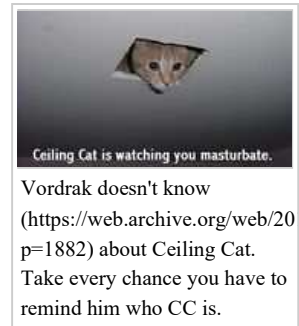
2015 has been a very productive year for Vordrak's blog with double the amount of published entries than the previous year. Vordrak joined the GamerGate bandwagon and made war on James Billingham's Block Bot. In April 2015, a former Block Bot developer AuntySarah accused Vordrak of harassment, but Vordrak and his knowledge of law allowed him to handle the claims easily (<http://matthewhopkinsnews.com/?p=1430>) .

Vordrak also tried to build a case against Block Bot (<http://matthewhopkinsnews.com/?p=1349>) but discontinued it in May (<http://matthewhopkinsnews.com/?p=1512>) . Vordrak also started "Operation Untechnica" (http://thisisvideogames.com/gamergatewiki/index.php?title=Projects:Operation_Untechnica) , but had difficulties running it: some anons had other ideas (<http://archive.is/zsIFT>) , defacement of the Operation page was plentiful (<http://archive.is/MhnSz>) , and the legitimacy of the entire project was questioned (<https://archive.is/vME70>) . Eventually, Vordrak had to shut the project down (<https://archive.is/HyFjZ>) .

Wikipedia and Wikipediocracy

In March 2014, Chase me ladies, I'm the Cavalry began a year-long mission to try to connect Contribsx to Grant Shapps. A year later, the Cavalry performed an extensive series of CheckUser actions against Contribsx and blocked Contribsx as Shapps' sockpuppet, all the while in contact with a reporter for *The Guardian*. Cavalry blocked Contribsx as Shapps' sockpuppet, and *The Guardian* publicized the accusations (<http://www.theguardian.com/politics/2015/apr/21/grant-shapps-accused-of-editing-wikipedia-pages-of-tory-rivals>) , but not in that order (oops).

ArbCom performed an investigation into the Cavalry's account of the story, and this drew Vordrak into Wikipedia. Vordrak's first task: suggest a Puritanical approach to which usernames are acceptable (<https://en.wikipedia.org/w/index.php>)



title=Wikipedia_talk:Arbitration/Requests/Case/Sockpuppet_investigation_block/Proposed_decision&diff=665898759) . Eventually, ArbCom absolved Contributx and published the Cavalry for his transgressions.

In July 2015, Wikipedia critic forum Wikipediocracy published a blog entry on Vordrak (<https://archive.is/wM4C2>) , and Vordrak retaliated by publishing a blog entry on thekohser (<https://web.archive.org/web/20150717003733/http://matthewhopkinsnews.com/?p=1882>) . Vordrak was apparently under the impression that thekohser was a serious journalist and that examiner.com was a serious online newspaper when neither are. Puritan Vordrak also displayed his lack of appreciation for the lulz and his lack of knowledge about Ceiling Cat:

One of Mr Kohs' admitted accounts is called, "*Feline Who Watches You Masturbate From Above*". The strange, sexualised account name is indicative of his indecorous social conduct

Vordrak and Wikipediocracy later took their blog entries on each other down. Vordrak claimed that this was due to a "reciprocal end to hostilities" (http://www.reddit.com/r/KotakuInAction/comments/3dk4ki/people_oc_dishonest_gamergate_opponent_journalist/) , but it only shows that Vordrak believes in *quid pro quo* and is corruptible: he'll censor his own blog in exchange for favors.

Ban from Wikipedia

Vordrak, still high off of his victory against Wikipediocracy, decided to take his arch-nemesis Mark Bernstein to ArbCom, but he overplayed his hand. Despite his buddy AmethyGloriCorn advertising the case on Reddit (http://www.reddit.com/r/KotakuInAction/comments/3dqupr/dramapaedia_vordrak_has_just_submitted_an_arbcom/) , Vordrak's cause received virtually no support at Wikipedia (<https://en.wikipedia.org/w/index.php?title=Wikipedia:Arbitration/Requests/Case&oldid=672034757#MarkBernstein>) . Seeing that his case was sinking fast, Vordrak began making veiled threats:

ORLY? Well, alright then ...

—Vordrak getting serious (<https://en.wikipedia.org/w/index.php?title=Wikipedia:Arbitration/Requests/Case&diff=672017860>)

I have archived Gamaliel's comments about his proposed reasons for blocking me here (<https://archive.is/UkEJg>) . I am not entirely sure he has thought it through but invite him to reconsider. I am not entirely sure he has thought it through but invite him to reconsider.

—Vordrak implying consequences (blog entry about those comments) (<https://en.wikipedia.org/w/index.php?title=Wikipedia:Arbitration/Requests/Case&diff=672017860>)

Under the latter circumstances [me as an outsider] I am free to say what I like and to reveal the real world names of people I would not otherwise have named.

—Vordrak implying that it would be unwise to cast him out (<https://en.wikipedia.org/w/index.php?title=Wikipedia%3AArbitration%2FRequests%2FCase&diff=672018708&oldid=672018451>)

In response to these messages, Floquenbeam banned Vordrak (<https://en.wikipedia.org/w/index.php?title=Special%3ALog&type=block&page=User%3AVordrak>) :

17:36, 18 July 2015 Floquenbeam (talk | contribs) blocked Vordrak (talk | contribs) with an expiry time of indefinite (account creation blocked, email disabled, cannot edit own talk page) (veiled (very thinly) threats to out others https://en.wikipedia.org/w/index.php?title=Wikipedia:Arbitration/Requests/Case&oldid=672018719#Statement_by_Vordrak)

As being banned for intimidation doesn't make for a good martyr story, Vordrak spun the story by claiming that he was banned by the reasons suggested by Gamaliel (<https://web.archive.org/web/20150718221130/http://matthewhopkinsnews.com/?p=1962>) . Being banned for threats of "negative media scrutiny" and for suggesting a fun, little "satirical animated GIF" contest sounds a long better to Gamergate drones than "veiled (very thinly) threats to out others". Floquenbeam and his stated reasons for the ban aren't even mentioned in Vordrak's blog entry.

The original version of Vordrak's blog entry (<https://web.archive.org/web/20150718221130/http://matthewhopkinsnews.com/?p=1962>) concluded with the following:

I am now free to name Wikipedia editors where there is public interest and / or to take legal action if I wish.

Starting by naming Gamaliel. Watch this space.

—Vordrak telling Wikipedia, "I told it would be unwise to cast me out. Waahhh."
(<https://web.archive.org/web/20150718221130/http://matthewhopkinsnews.com/?p=1962>)

Sorry, Vordrak, but ED been there and done that already.

Ultimately, Vordrak decided not to publish Gamaliel's dox (<http://matthewhopkinsnews.com/?p=1974>) and replaced the "Starting by naming..." line with a claim (<http://matthewhopkinsnews.com/?p=1962>) that Floquenbeam and the other Wikipedia sysops follow Gamaliel's every word, worship his every step, and savor his every breath.

TheGGGreatWork

In June 2015, Vordrak and AmethyGloriCorn created a subreddit called TheGGGreatWork (http://www.reddit.com/r/TheGGGreatWork/comments/3a7ybu/introduction_to_the_great_work/) in order to encourage and coordinate the countering of alleged SJW infiltration within Wikipedia. They encouraged users to be patient and build "Wikipedia Capital" by giving each other Barnstars and engaging in RecentChanges and anti-vandalism paroling.

In July, after Vordrak's ban from Wikipedia, Vordrak's partner in crime AmethyGloriCorn announced a new approach to influencing Wikipedia (http://www.reddit.com/r/TheGGGreatWork/comments/3exn2c/introduction_to_the_great_work_revised/) :

The only way to achieve justice on Wikipedia is to achieve power on Wikipedia and that means we need our members to achieve administratorship. On Wikipedia that is relatively easy as there is an elected system called RFA. We therefore advise editors to build up edits in non-contentious areas and complete RFA before going anywhere near GamerGate or related topics. Edit articles about water gardens. Sprockets. Anything but GG. Water gardens are cool.

In other words, AmethyGloriCorn is asking for willing Manchurian Candidates to infiltrate Wikipedia, hide their true agenda, and then when the time is right, dupe naive voters who aren't aware of their hidden motives into voting for them.

When AmethyGloriCorn shared his or her plan on KotakuInAction (http://www.reddit.com/r/KotakuInAction/comments/3exr2i/dramapedia_goals_the_great_work_has_a_change_of/) , Vordrak not only expressed his support but "better yet", also suggested obtaining sysops bits in order to "arbitrarily block" their opponents (http://www.reddit.com/r/KotakuInAction/comments/3exr2i/dramapedia_goals_the_great_work_has_a_change_of/ctjfovr) :

[O]n Wikipedia administrators are elected. Anyone can be put forward at any time for what is called RFA (requests for adminship). The 'community' votes. In reality about 100 people participate in most RFAs. If someone gets 80% + votes then bam! They are an admin.

KiA has nearly 48,000 members. You do the math. Instead of whining at administrators to deal with Bernstein, AmethyGloriCorn is proposing KiA members become administrators and deal with him and the article themselves.

Better yet, normally administrators cannot just arbitrarily block people but thanks to ArbCom imposed GamerGate discretionary sanctions they are allowed to [arbitrarily block people] in relation to GamerGate controversies. :) Furthermore there are already many calls for most of the anti-GG people.

One admin willing to shoulder some flack could block the entire aGG slate. And we do not anticipate there being just one. admin.

In other words, Vordrak is asking for patient assassins to infiltrate Wikipedia, become sysops, and then stab unsuspecting ideological opponents in the back.

Adam Roberts

In late July 2015, Vordrak attempted to pick a fight with (https://www.reddit.com/r/KotakuInAction/comments/3flkxz/goal_guardian_runs_article_by_adam_roberts/) author Adam Roberts, going as far as butt into a conversation between Adam Roberts and Natascha de Waal (<http://archive.is/VliMX>) while promising to publish an exposé so shocking that it would prevent Adam Roberts from giving public speeches ever again. Yet nothing come of this. Vordrak has yet to publish any blog entries about Adam Roberts.



Github

After making such bold talk about exposing Adam Roberts on his blog yet not actually doing it, Vordrak shifted gears again and found a target that would dominate Vordrak's attention for the next couple of weeks: Github and Todogroup's draft "Open Code of Conduct" (<http://todogroup.org/opencodeofconduct/>). Todogroup's "Open Code of Conduct" contains the following SJW self-righteous lunacy:

Our open source community prioritizes marginalized people's safety over privileged people's comfort. We will not act on complaints regarding:

- 'Reverse' -isms, including 'reverse racism,' 'reverse sexism,' and 'cisphobia'

The draft code divides communities to a first class ("marginalized people") to be prioritized and a second class ("privileged people") to be, well, *marginalized*.

The Code began sanely enough

(<https://github.com/todogroup/opencodeofconduct/commit/02f7253ef0b84e8a97bf6b5062c3dade252c3af0>) , but on June 22, 2015, "ammeep" appeared (<https://github.com/todogroup/opencodeofconduct/pull/8>) and sought to incorporate, word-for-word (<https://github.com/todogroup/opencodeofconduct/commit/45aa6da5e2b5fcb6e1185ca05b1f75e141591558>) , the Geek Feminism Code of Conduct's "Definitions" section (<http://geekfeminism.org/about/code-of-conduct/>) , including the aforementioned controversial text, into the Open Code of Conduct. Fortunately, "caniszczyk" merged only a modest amount of ammeep's contributions into the master branch (<https://github.com/todogroup/opencodeofconduct/pull/8#issuecomment-117367373>) .

On July July 20, ammeep made a second attempt (<https://github.com/todogroup/opencodeofconduct/pull/17>) to incorporate Geek Feminism Code of Conduct's "Definitions" section

(<https://github.com/todogroup/opencodeofconduct/commit/b00eff579ded8c76cee0d2cb6b5beed6e84258fb>) , and on the 29th, "Bkeepers" conceded to ammeep's demands

(<https://github.com/todogroup/opencodeofconduct/commit/10e57b28978a2bd1d63e8fc0f2b4c437f3619f69>) .

Several days later, Vordrak picked up on this and send a draft copy of his exposé to Github for review. Github objected, claiming copyright violations and "actionable, factual misrepresentations" (<http://matthewhopkinsnews.com/?p=2055>) . Such vague legal threats from a popular website and business would unnerve most, but as a law student, Vordrak knew that Github was full of shit and proudly leveraged this fact. Vordrak published a blog entry (<http://matthewhopkinsnews.com/?p=2035>) filled with exclamations marks and **bold, green text** and bragged about how dumb Github staffers are for licensing their photos under Creative Commons open source licenses, and when Vordrak finally published his blog entry about the Open Code of Conduct (<http://matthewhopkinsnews.com/?p=2030>) , he devoted a few of its paragraphs to speaking about how inept Github's lawyers are and they forfeited the ability to gain money from suing Vordrak when they decided to not take Vordrak seriously and to not reply back.

Now, onto that blog entry (<http://matthewhopkinsnews.com/?p=2030>) , which Vordrak advertised on Twitter as "[Does Github believe that it's] Ok to Harass White Women?" (<http://archive.is/PUMdG>) Sensationalism sells, and Vordrak knows it. Although "reverse racism / sexism / whatnot" usually takes the form of affirmative action critique (i.e. "X got the job instead of me because of his race / sex" (https://twitter.com/_peppercats/status/628409014993481730)), Vordrak marketed "reverse racism" as "[permissible] to harass white women".

On August 10th, ammeep's fiancé "martin308" challenged Vordrak via Twitter

(<https://twitter.com/martin308/status/630895334294601728>) , claiming that Vordrak had his name wrong. Vordrak revised his article (<http://archive.is/1biNs>) but warned martin308 not to mess to him (<http://archive.is/CADoN>) .

Beef with Kiwi Farms

Starting on April 16th, 2016 Vordrak began writing daily articles on Null and the Kiwi Farms. The first article cites the Encyclopedia Dramatica pages as irrefutable evidence that the site admin rapes and murders children and animals (<https://archive.is/tj4ZY>) on a daily basis and uses the Kiwi Farms to do so. His interest was turned to the Kiwi Farms because of a thread on him (<https://kiwifarm.ms/threads/vordrak-samuel-collingwood-smith-matthew-hopkins.16771/>) , but did not start writing hit pieces until the site started running a GamerGate parody forum (<https://kiwifarm.ms/forums/official-gamergate-hq.68/>) that hurt GG's stellar public image and caused KotakuInAction to shit their pants. Not wanting GamerGate to pick up the reputation of being about harassment, Vordrak began harassing everyone Null's family (<https://archive.is/gvpNi#selection-249.0-252.0>) and everyone he had ever met (<https://archive.is/QR5nW#selection-319.0-322.0>) and promised to do so as long as the Kiwi Farms stayed up (<https://archive.is/hx4NZ#selection-351.0-354.0>) . Thanks to his efforts, GamerGate's reputation was saved and now there are #EthicsInVideoGameJournalism.

Some retard on Kiwi Farms's wiki also 'wrote' an article (https://lolcow.wiki/wiki/Samuel_Collingwood_Smith) on Samuel's adventures, but for some reason no search engine will deliver it as a result. They will show Kiwi Farms pages and other Lolcow Wiki articles that are direct copies of the same page, but not the actual article. Surely this is a coincidence and not the result of Vordrak chimping out and crying to Jewgle about google bombing. Considering he does it to other people he's never met and brags about it (<https://archive.is/F8KcE>) , that would make him a hypocrite, which is impossible as we know Samuel Collingwood Smith is a righteous moral authority and unbiased judicator.



Search results for Samuel Collingwood Smith's name on three different search engines which all carefully omit Lolcow Wiki results.



Depicted: Samuel Collingwood Smith mourns his long-distance relationship with Joshua Conner Moon. His marriage proposals had been turned down.

His elderly, physically, emotionally, and sexually abused mother decays in the background.

Beef with Encyclopedia Dramatica

After calling people a pedophile for 10 fucking years straight without reprise, Vordrak crumbles the first time anyone points out that he himself is a child molester and threatens a LOLsuit, which he claims definitely will not be held in "LOLcourt", because this has **NEVER HAPPENED BEFORE**.

Hi there,

My name (in real life) is Sam Smith. I write <http://www.matthewhopkinsnews.com>. There has been an article about me here for a long time under the name, 'Vordrak'. I have always thought it to be legitimate satire and ignored it. I do charity work, and indeed have been praised in Parliament for my legal skills



✂ **Honorary Ed Lolington Vordrak** ✂
is part of a series on
Internet Law.
[With Liberty and Drama for All]

(<http://www.publications.parliament.uk/pa/cm201314/cmhansrd/cm131127/petntext/131127p0001.htm>) and I am big enough to live with it.

Recently, I have been writing about Kiwi Farms. You already have an article about them, and a separate one about their administrator Ichverbot. I believe that they have been sending me emails trying to rile me up against a sysop here called LikeICare•(talk)•(Contribs) and I ignored them.

Last night, looks like LikeICare had an argument with an account called Tribbons which he mistakenly believe to be me. Perhaps it is a Kiwi. Regardless, the account provoked him by calling him by his middle name and he amended the article to include a section entitled, 'Samuel Collingwood Smith is a Pedophile and Child Rapist'. This goes beyond satire, and into the realms of defamation.

LikeICare was clearly acting from malice, specifically in ED terms, 'butthurt' at being called by his middle name. Furthermore, he is showing a lack of objectivity. The user account at issue was trying to upload a screenshot from my blog in which hosting company Gandi.net bans (<http://matthewhopkinsnews.com/wp-content/uploads/2016/04/KiwiFarmsIllegalMaterial.png>) Ichverbot (Josh Moon) for having CP. One reason I have always respected ED is its objectivity and as you can see the log does support the article I included it in. I can see why Tribbons wanted to include it here.

Having said that, I do not vanity edit. So I would like to invite you to do the right thing and remove LikeICare's additions. I am going to post this message on the talk page for all of the Bureaucrats and I will freeze the first message on Bender's page to show I raised it in this way.

I assume you will do the right thing but failing that I am to issue proceedings - and not in LOLCourt. Can I also have a contact postal address. You can email me at the address registered to this account to provide it. Vordrak 18:22, 13 May 2016 (EDT)

Fun facts

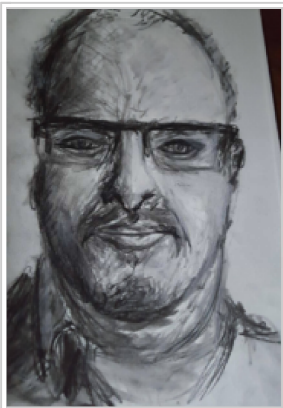
- Vordrak operated two We Are the Fallen fan-sites: WeAreTheFallenCampaignTeam.com (<http://archive.is/zT2Kq>) and WeAreTheFallenBoard.com (<http://archive.is/bjnlL>) .
- Vordrak is massive Nyancat enthusiast (<http://matthewhopkinsnews.com/?p=222>) , despite being 34 at the time.
- Vordrak is An Ann Coulter fan (<http://www.okcupid.com/profile/Vordrak>) .

See also


- What people have to say about Vordrak

External links

- Matthew Hopkins – The Witchfinder General (<http://matthewhopkinsnews.com/>)
- Lolcow Wiki article (https://lolcow.wiki/wiki/Samuel_Collingwood_Smith)
- Vordrak's KiwiFarms thread (<https://kiwifarm.ms/threads/vordrak-samuel-collingwood-smith-matthew-hopkins.16771/>)
- Vordrak at Wikipedia
- Vordrak at the GamerGate wiki (<http://thisisvideogames.com/gamergatewiki/index.php?title=Special:Contributions/Vordrak>)
- Vordrak's Reddit account (<https://www.reddit.com/user/Vordrak>)
- Vordrak's OkCupid account (<http://www.okcupid.com/profile/Vordrak>)



Vordrak fan art.




Vordrak


is part of a series on

Taking Down ED

[Do It Faggot]



VORDRAK IS PART OF A SERIES ON CHRISTIANITY




BLESSED BY GOD [+]

BELIEFS, EVENTS, TRADITIONS AND OTHER DRAMA [+]

PISSING OFF THE ALMIGHTY [+]

HEATHENS [+]

Vordrak is part of a series on Child Abuse



MAIN PLAYERS [+]

TYPES OF CP [+]


V& PEDOPHILES [+]

UNV& PEDOPHILES [+]

RELATED TOPICS [+]

Preceded by David Futrelle	Featured article May 16 & 17, 2016 Vordrak	Succeeded by TBA
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Retrieved from "<https://encyclopediadramatica.se/Vordrak>"
Categories: Law | Taking Down ED | Christianity | Child Abuse | Featured Articles | People
VPN Service



Increase engagement and revenue for your own website

IN THE HIGH COURT, QUEEN'S BENCH DIVISION
ROYAL COURTS OF JUSTICE

CLAIM NUMBER _____

BETWEEN

SAMUEL COLLINGWOOD SMITH

CLAIMANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'LIKEICARE'

1st DEFENDANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'KIWINULL'

2nd DEFENDANT

AND

UNKNOWN DEFENDANTS, OPERATORS OF WEBSITE
ENCYCLOPEDIADRAMATICA.SE

3rd DEFENDANT

ANNEX II TO PARTICULARS OF CLAIM

This is the document referred to as 'Annex II' in the Particulars of claim.

Signed

Sam Smith

Date 15/05/2016

User talk:Vordrak

From Encyclopedia Dramatica

(Difference between revisions)

Revision as of 00:08, 14 May 2016 (view source)

Vordrak (Talk | contribs)

(Letter Before Action and S5 Notice Then)

← Older edit

Latest revision as of 00:22, 14 May 2016 (view source)

Likeicare (Talk | contribs)

Line 111:

[[File:N1DraftVordrak.png]]

Line 111:

[[File:N1DraftVordrak.png]]

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****OFFICIAL RESPONSE FROM MYSELF, AND ON BEHALF OF KIWIDYNSATIA AND ENTIRETY OF ED STAFF****

'''LOL DONT CARE FAGGOT, GO FOR IT'''

--[[User:Likeicare|Likeicare]] 20:22, 13 May 2016 (EDT)

</center>

Latest revision as of 00:22, 14 May 2016

Welcome, Vordrak

This is serious. **READ IT.**

Before making your first article look over ED:101. If you don't, it is unlikely that your article will survive for more than sixty seconds and you risk being banned by ED Sysops.

We realize a lot of you are busy or may be new to ED, so here's just the most important info:

- **Read ED:101. Seriously. The information contained within is invaluable.**
- To answer a message, reply on the user's talk page (Tab at the top that says 'discussion').
- Sign your comments using four tildes (like this ~~~~)
- These are the sysops. If you have a problem, talk to them. They're here to help, we promise.
- The TJC is the community portal. It's linked to from every page. Check it daily.
- Use Special:Upload to upload pictures. Be sure to give them meaningful names.
- Active editors and sysops can be found on ED IRC. This is the place to go for advice, collaboration, and brownie points.
- Feeling social? Enjoy forums? We've got one. 🌐 **Join here.** (<https://forum.encyclopedia-dramatica.se/>)
- See ED:HELP and ED:POLICY for everything else.

BMO 17:38, 13 May 2016 (EDT)

A22

Contents

- 1 Re: Complaint
- 2 Samuel Collingwood Smith, please, go fuck yourself
- 3 S5 Notice and Letter Before Action
 - 3.1 S5 Notice
 - 3.2 Letter Before Action

Re: Complaint

I alerted the others to your complaint. Please wait for a response. - Zew0 18:30, 13 May 2016 (EDT)

Thanks Zew0. A couple of things. Firstly, when do you think I can expect a reply, please?

Just to draw your attention to the emails I have been getting trying to rile me up over LikeICare, this is an example (I have blocked out the sender) -

From: P***** S***** [1] (/cdn-cgi/l/email-protection#1f6f3535353535316c35353535f7e6c767e317c7072)
Sent: 26 April 2016 07:41
To: *****.com
Subject: Kiwi farms aren't the real internet menace

i noticed your recent articles on Kiwi Farms and more specifically Null, and you label him as a bad person

but there is a real monster on Kiwi Farms who posts there under the name LikeicareKF. He is Likeicare, one of the head admins on Encyclopedia Dramatica and rumored to be the real person running ED. any look at his posts on the ED forums will tell you what type of person he is. and is so far responsible for the suicides of at least 3 people, and released the personal information of hundreds of journalists and executives during Gamergate


I ignored this. Just another case of Kiwis trying to play all sides against each other. Unfortunately I am not so sure LikeICare realised he was being set up.

Vordrak 18:37, 13 May 2016 (EDT)

Here is you reply Sam, fuck off lol --Likeicare 19:03, 13 May 2016 (EDT)

Samuel Collingwood Smith, please, go fuck yourself

We here at ED don't give a flying fuck about you. You just another whiny manchild who wants the internet to quit saying mean shit about you, when frankly you deserve all that and more. In fact, if you hassle ED staff again about this toothless, impotent bawling bullshit about suing anyone, I will permaban your ass if another admin doesn't do so first, all your socks will be banned, and we will link each sock to your ED article and include links to the Kiwi Farms shit about you so you will never be able get Google to quit reporting how much of a depraved, creepy fuck you are on the first page results. You have no legal power here, others have tried and failed to lolsuit us, and you just need to fuck off and go back to jerking off over those body pillows of the Evanescence singers

you've whacked your shriveled British dick to. Either that, or do the world a favor and provide some lulz in the process. Don't really care, so long as you get the hint we don't give a damn. *DarkLordTR* -->  19:05, 13 May 2016 (EDT)

S5 Notice and Letter Before Action

Zew0•(talk)•(Contribs) Likeicare•(talk)•(Contribs) DarkLordTR•(talk)•(Contribs) (Shrugs) No skin off my nose if you want to be unreasonable.

S5 Notice

NOTICE OF COMPLAINT SECTION 5, DEFAMATION ACT 2013 (UNITED KINGDOM) The Defamation (Operators of Websites) Regulations 2013 SI 2013/3028

In this notice DA refers to the Defamation Act 2013 and DAR refers to Statutory Instrument 2013/3028 also called The Defamation (Operators of Websites) Regulations

THIS DOCUMENT IS A COMPLAINT UNDER DA SECTION 5 (3) (b).

DA s5 (6) (a) My name is Samuel Smith, I also use the pen name Matthew Hopkins (a historic figure) DAR s2 (a) The email address at which I may be contacted is

DA s5 (6) (c) The statements complained of are at the following URLs - (I) <https://encycopediadrarnatica.se/Vordrak>

DA s5 (6) (b) and DAR s2 (b) – (c) The statements complained of read - (I) "[...]KNOWN CHILD MOLESTOR[...]" and "[...] Samuel Collingwood Smith is a Pedophile and Child Rapist [...]" and all of the associated statements under that heading

- The defamatory meaning imputed to these statements, accompanied by my photograph, is an allegation that I am a paedophile and child rapist.

DAR s2 (d) I confirm that I do not have sufficient information to bring proceedings against the authors of the statements, the users named LikeICare and KiwiDynastia because they are using pseudonyms and do not give contact details and because it is the policy of the website Encyclopedia Dramatica to conceal the identities of its editors and operators.

DAR s5 (e) I consent to my name and email address being disclosed to the users @LikeICare and @KiwiDynastia and anyway it is written above.

Letter Before Action

11 By the Mount Welwyn Garden City Hertfordshire AL7 3SY

Saturday, 14 May 2016

Dear LikeICare, KiwiDynastia and ED Bureaucrats,

Letter Before Action

I WRITE FORMALLY TO COMPLY WITH THE PRACTICE DIRECTION ON PRE-ACTION CONDUCT AND ALSO THE PRE-ACTION PROTOCOL FOR DEFAMATION

Basically, before suing I have to write you a letter that complies with these rules here - https://www.justice.gov.uk/courts/procedure-rules/civil/protocol/prot_def and if you fail to comply I may issue the Court proceedings and you may be ordered to pay my costs.

And so ...

A24

NAME OF CLAIMANT - Samuel Collingwood Smith CLAIMANT ADDRESS - See above

DEFENDANTS - (1) The user of the website 'EncyclopediaDramatica.se', LikeICare (2) The user of the website 'EncyclopediaDramatica.se', KiwiDynastia (3) The operators of the website 'EncyclopediaDramatica.se', subject to their not responding in the correct form to the S5 notice above.

PUBLICATIONS COMPLAINED OF - Per the S5 Notice Accompanying this Letter

WORDS AND MEANINGS COMPLAINED OF - Per the S5 Notice Accompanying this Letter

REASONS FOR FACTUAL DISPUTE - The Defendant cannot possible prove these allegations, which are put up in retaliation because I got their friend's website KiwiFar.ms taken down by its host Gandi.net (which confirmed there really was child pornography there).

REMEDIES SOUGHT - Damages and an injunction. These would ordinarily be very large, but the Defendants may be impecunious so for the purposes of this action, will issue a claim for £10,000 but apply to amend when and if their identities are revealed.

An application for interim relief to remove the statements will be sought, along with an application to block the website entirely within the United Kingdom. Costs on the indemnity basis are sought for refusing to reply to the complaint in a reasonable fashion.

The user KiwiDynastia also uses Twitter and an order for disclosure of his identifying information will be sought. He may wish to avoid this.

Date for Response Immediately, and in any event no later than 9am GMT 16/05/2016.

Kind regards,

Sam Smith

I am not joking and see no downside to this. Draft N1 is below to underline the point ---> :)



Claim Form

In the HIGH COURT, QUEEN'S BENCH

Fee Account no.

For court use only

Claim no.

Issue date

**You may be able to issue your claim online which may save time and money.
Go to www.moneyclaim.gov.uk to find out more.**

Claimant(s) name(s) and address(es) including postcode

Samuel Collingwood Smith

SEAL

Defendant(s) name and address(es) including postcode

The operators of the website Encyclopaedia Dramatica.se - 'Like!Care' and 'KiwiDynastia' . Defendant(s) refused to give an address, responding to a polite complaint, with 'Fuck Off'.

Brief details of claim

Claimant seeks damages and an injunction for defamation because the Defendant amended an article about him to state, "Samuel Collingwood Smith is a Pedophile and Child Rapist" and other similar statements. Malicious defamation is alleged per the particulars.

The Defendant is an Administrator of an Internet site of a satirical nature, Encyclopedia Dramatica, whose users believe themselves above the law due to the international nature of the site and various mechanisms to obfuscate their real identity. Appropriate applications for disclosure and interim relief accompany the form N1.

Value

The claimant believes the Defendant is impecunious and seeks £10,000 but considers it may be equitable to apply to revise the Particulars once they and any fellow tortfeasors have been identified.

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Royal Courts of Justice, the Strand

Defendant's
name and
address for
service including
postcode

Unknown

An order for disclosure is sought.

£

Amount claimed	10000
Court fee	500
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

N1 Claim form (CPR Part 7) (05.14)

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******OFFICIAL RESPONSE FROM MYSELF, AND ON BEHALF OF KIWIDYNSATIA AND
ENTIRETY OF ED STAFF******

LOL DONT CARE FAGGOT, GO FOR IT

--Likeicare 20:22, 13 May 2016 (EDT)

Retrieved from "https://encyclopedia.dramatica.se/User_talk:Vordrak"

VPN Service

Sam Smith

From: Sam Smith [sam_smith@highflier.me.uk]
Sent: 15 May 2016 17:50
To: 'contact@encyclopediadramatica.se.getnotify.com';
'Likeicare@encyclopediadramatica.se.getnotify.com';
'Kiwidynastia@encyclopediadramatica.se'
Subject: Monday
Importance: High

Hi,

I sent you a letter of claim earlier this week. The deadline on the claim letter expires at 9am GMT.

I have been finalising all the court documents, which are nearly done. There is one minor change to what I said. It is not possible to increase the amount of the claim after issue, so I will be limited to claiming the £10K if that is what I issue.

I assume this will make no difference to your response anyway.

Kind regards,

Sam Smith

IN THE HIGH COURT, QUEEN'S BENCH DIVISION
ROYAL COURTS OF JUSTICE

CLAIM NUMBER _____

BETWEEN

SAMUEL COLLINGWOOD SMITH

CLAIMANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'LIKEICARE'

1st DEFENDANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'KIWINULL'

2nd DEFENDANT

AND

UNKNOWN DEFENDANTS, OPERATORS OF WEBSITE
ENCYCLOPEDIADRAMATICA.SE

3rd DEFENDANT

ANNEX III TO PARTICULARS OF CLAIM

This is the document referred to as 'Annex III' in the Particulars of claim.

Signed

Sam Smith

Date 15/05/2016



[Browse Top Sites](#) or

Menu

- [Menu](#)
 - [Site Comparison](#)
 - Keyword Research
 - [Keyword Difficulty](#)
 - [Research by Site](#)
 - [Research by Query](#)
 - [On-Page SEO Checker](#)
 - [Audits](#)
 - [Find Sites](#)
 - [Toolbar](#)
 - [About Us](#)
- [Dashboard](#)
- [Support](#)
- [Blog](#)

[sam_smith@highflier.me.uk](#)

- [Account Management](#)
- [Payment History](#)
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- Keyword Research
 - [Keyword Difficulty](#)
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- [Find Sites](#)
- [Toolbar](#)
- [About Us](#)
- [Support](#)
- [Blog](#)
- [Browse Top Sites](#)
-

Competitive Intelligence

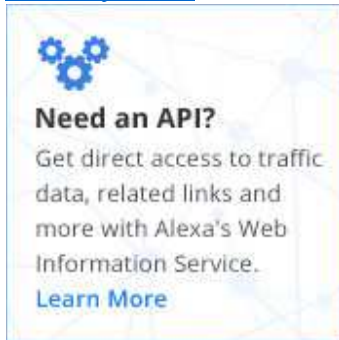
Site Overview

- encyclopediadramatica.se

Is this your site? [Certify your site's metrics.](#)

|||

- Site Overview
- [Site Comparisons](#)
- [Sites Linking in](#)
- [Site Keywords](#)



Certified Site Metrics are metrics that are directly-measured from the website instead of estimated. The website owner has installed an Alexa Certify Code on the pages of their site and chosen to show the metrics publicly.

For the website owner Certified Metrics provide:

- A more accurate Alexa Rank
- A private metrics Dashboard for On-Site Analytics
- The ability to publish unique visitor and pageview counts if desired

Certified Metrics are available with all Alexa Pro plans.

[View Plans and Pricing](#) [Learn More](#)

Not all websites implement our on-site analytics and publish the results. For these sites, we show estimated metrics based on traffic patterns across the web as a whole. We identify these patterns by looking at the activity of millions of web users throughout the world, and using data normalization to correct for any biases.

The more traffic a site gets, the more data we have to calculate estimated metrics. Estimates are more reliable the closer a site is to being ranked #1. Global traffic ranks of 100,000+ are subject to large fluctuations and should be considered rough estimates.

If a site has Certified Metrics instead of estimated, that means its owner has installed code allowing us to directly measure their traffic. These metrics have a greater level of accuracy, no matter what the ranking.

[Learn more about Alexa's Data](#)

[View Plans and Pricing](#)

How popular is encyclopediadramatica.se?



Alexa Traffic Ranks

How is this site ranked relative to other sites?



Global Rank ? Alexa Traffic Rank

An estimate of this site's popularity.

The rank is calculated using a combination of average daily visitors to this site and pageviews on this site over the past 3 months. The site with the highest combination of visitors and pageviews is ranked #1.

Updated Daily

🌐 32,208 5,777

- -5777%

Rank in [United States](#) ? Traffic Rank in Country

An estimate of this site's popularity in a specific country.

The rank by country is calculated using a combination of average daily visitors to this site and pageviews on this site from users from that country over the past month. The site with the highest combination of visitors and pageviews is ranked #1 in that country.

Updated Daily

🇺🇸 9,977

- %

Alexa Traffic Ranks

The global and country traffic ranks show how popular a site is relative to other sites.

- [Learn more about Alexa's Data](#)
- [Traffic Metrics FAQs](#)

Unique Visitors and Pageviews

The number of people who visit this site and the number of pages they view. Site owners who install the Alexa Certify Code on their website can choose to display their Certified Metrics, such as Monthly Unique Visitors and Pageviews, if they wish. For other sites, we display the estimated number of unique visitors from up to 6 countries, when sufficient data is available (Advanced plans only).


- [Learn more about Certified Metrics](#)
- [Certified Site Metrics FAQs](#)

Audience Geography

The audience geography data describes where visitors to this site over the past month are located, and how the site is ranked in popular countries. If a country is not listed, it is because Alexa does not have enough data for this site to rank/measure the site's popularity among that country's online population. These metrics are updated monthly.

Monthly Unique Visitor Metrics

Past 30 Days — Last Updated May 13, 2016

Country [?]	Estimated Unique Visitors [?]	Estimated Visits [?]	Estimated Pageviews [?]
Country Data is currently available for some or all of the following countries:	[?] Estimated Unique Visitors The estimated number of unique people that visited this site over the past 30 days.	Estimated Visits The estimated number of visits to this site over the past 30 days. A visit is a single browsing session, meaning the visitor used the site with no breaks longer than 30 minutes. A single visitor may have made multiple visits.	Estimated Pageviews The estimated number of pageviews for this site over the past 30 days. A pageview is recorded whenever a full page of the website is viewed or refreshed. Partial page refreshes don't count as a pageviews. A single visit may consist of multiple pageviews.
United States	Updated Daily	Updated Daily	Updated Daily
Canada			
United Kingdom			
Germany			
France			
Spain			
 United States	361,880	568,870	2,352,097

Loyalty Metrics [?] See how much a country's visitors remain engaged over time. Based on Monthly Unique Visitor, Visit, and Pageview estimates in each country where those metrics are available.

Based on unique visitor estimates Visits per Visitor

1.57 Pageviews per Visit

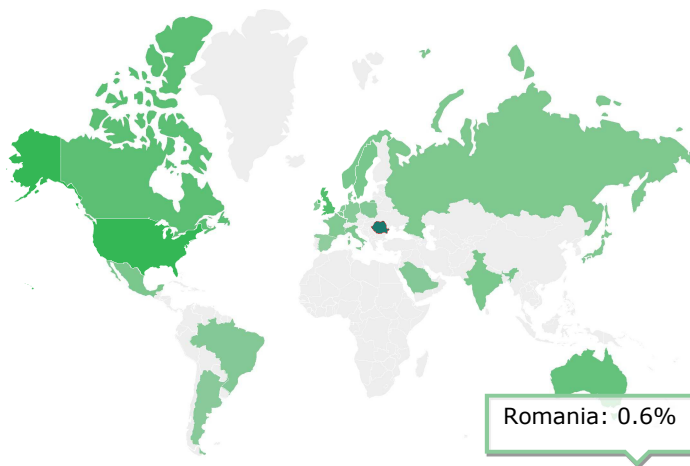
4.13 Monthly Pageviews per Visitor

6.50

Audience Geography

Where are this site's visitors located?

Visitors by Country



Country	Percent of Visitors	Rank in Country
United States	49.5%	9,977
United Kingdom	10.1%	7,561
Canada	6.9%	6,286
Australia	4.1%	7,020
Sweden	1.5%	9,572
Mexico	1.4%	20,026
India	1.4%	117,220
Norway	1.4%	5,553
Russia	1.2%	110,730
Italy	1.2%	42,223
Belgium	1.1%	8,118
France	1.0%	65,931
Japan	1.0%	103,526
Saudi Arabia	0.9%	17,392
Brazil	0.9%	63,161
Poland	0.9%	33,089
Netherlands	0.8%	32,106
Germany	0.7%	66,523
Argentina	0.7%	18,882
Denmark	0.7%	9,940
Ireland	0.7%	11,388
Singapore	0.7%	22,896
Romania	0.6%	17,753
Spain	0.5%	109,241
More		

How engaged are visitors to encyclopediadramatica.se?



Bounce Rate

49.10% 5.00%

- 5%

Daily Pageviews per Visitor

4.39 14.00%

- 14%

Daily Time on Site

4:47 5.00%

- -5%

How engaged are visitors to this site?

Engagement metrics help you understand how interested a site's visitors are with the site's content. The metrics are updated daily based on the trailing 3 months.

Bounce Rate (%)

Percentage of visits to the site that consist of a single pageview.

Daily Pageviews per Visitor

Estimated daily unique pageviews per visitor on the site.

Daily Time on Site

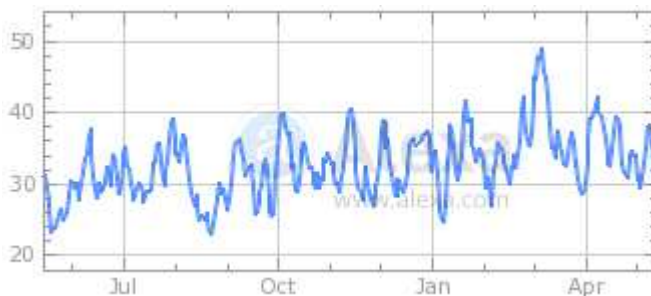
Estimated daily time on site (mm:ss) per visitor to the site.

Where do encyclopediadramatica.se's visitors come from?

?

Search Traffic

What percentage of visits to this site come from a search engine?



Search Visits

36.10% 9.00%

- 9%

Top Keywords from Search Engines

Which search keywords send traffic to this site?

Keyword	Percent of Search Traffic
1. imagefap	3.48%
2. chris chan	3.41%
3. sakura complex	2.07%
4. encyclopedia dramatica	2.05%
5. 4chan pol	1.93%

[More](#)

Search Traffic

The percentage of traffic, both free and paid, that come to this site from a search engine over the past 3 months, updated daily. The change number shows the difference versus the previous 3 month period.

Top Keywords from Search Engines

The table shows the top keywords that sent traffic to this site from major search engines over the past 6 months. The list is updated monthly.

Upstream Sites

Upstream sites are sites that people visited just before they visited this site. Note that this list is not the same as referrals from upstream sites. There is not necessarily a link between the upstream site and this site.

Upstream Sites

Which sites did people visit immediately before this site?

Site	Percent of Unique Visits
1. google.com	32.1%
2. youtube.com	7.2%
3. google.co.uk	3.4%
4. onclickads.net	3.1%
5. facebook.com	2.5%
6. google.ca	2.3%
7. reddit.com	1.8%
8. wikipedia.org	1.8%
9. twitter.com	1.6%
10. imgur.com	0.9%

[More](#)

Where do encyclopediadramatica.se's visitors go next?



Downstream Sites

Which sites did people visit immediately after this site?

Site	Percent of Unique Visits
------	--------------------------

	Site	Percent of Unique Visits
1.	google.com	21.6%
2.	youtube.com	11.1%
3.	onlickads.net	6.7%
4.	facebook.com	3.9%
5.	reddit.com	3.4%
6.	twitter.com	2.3%
7.	google.co.uk	2.2%
8.	google.ca	1.6%
9.	4chan.org	1.3%
10.	wikipedia.org	1.3%

[More](#)

Downstream sites are sites that people visit immediately after visiting this site. Note this does not necessarily mean that people are directed to the downstream site by this site

What sites link to encyclopediadramatica.se?



Total Sites Linking In

186

Site	Page
1. wikia.com	meme.wikia.com/wiki/Rules_of_the_Inter...
2. buzzfeed.com	buzzfeed.com/keenan/best-of-breaking-b...
3. secureserver.net	ip-173-201-142-193.ip.secureserver.net...
4. stumbleupon.com	stumbleupon.com/content/92w66V/lists
5. topix.com	topix.com/forum/afam/TLM910P885E89P6MA

[More](#)

The "Sites Linking In" count shows the number of sites that Alexa found that link to this site. For more information please see [this explanation](#) of how Alexa determines the number of sites linking in.

The complete list of sites linking to this site is available to Alexa Pro subscribers.

What sites are related to encyclopediadramatica.se?



Related Links

No related links available

Categories with Related Sites

This site is not categorized

Related Links

These are sites that are related to this site in some way. For example, they receive traffic from similar keywords, have a similar audience, or are frequently cited together on web pages. [Learn more.](#)

Other Sites Owned

These are other sites with the same registered owner as this site.

Sites with Similar Names

There are domain names that are similar to this site.

Categories with Related Sites

These are the categories that this site is in. Click on the category to browse other sites in that category.

Where do visitors go on encyclopediadramatica.se?



Subdomain	Percent of Visitors
encyclopediadramatica.se	91.91%
images.encyclopediadramatica.se	15.03%
forum.encyclopediadramatica.se	4.36%

The table shows the top subdomains for this site ordered by the percentage of visitors that visited the subdomain over a month. Note that the percentages can add up to more than 100% because a visitor can visit multiple subdomains during the month.

Updated Monthly.

How fast does encyclopediadramatica.se load?



Fast (1.253 Seconds), 68% of sites are slower.

The reported load time for a website is the median time it takes to load pages from that site in a real users' web browsers.

Alexa takes the median of all the page load times we observe for a site and then compares that to the same figure for all other sites. For example, a site in the 98th percentile (Very Fast) has a median load time faster than 98% of all measured sites, while a site in the 2nd percentile (Very Slow) loads more quickly than only 2% of all sites and is slower than 97% of all sites.

The load time of an individual page is how long it takes for the DOM - the structure of the page - to be loaded. This time doesn't include the time to load all images and stylesheets, for example.

The load time metric is updated monthly.

Where can I find more info about encyclopediadramatica.se?



-

Encyclopediadramatica.se

Site Description

A description has not been provided for this site.

[How did encyclopediadramatica.se look in the past?](#)

Contact

Contact information is not available.

[Edit Site Info](#)

To edit your site's public information you need to verify ownership of your site.

[Claim This Site](#) Cancel

Customize your site overview page with your logo, plus add links back to your site and much more! An Enhanced Site Overview is just one of the features you get with an **Alexa PRO** subscription.

[View Plans and Pricing](#)

Site Description

A short description of the site.

Contact

How to contact the owner of the site.

Who visits encyclopediadramatica.se?



Audience Demographics

How similar is this site's audience to the general internet population?

Gender

Internet Average

Male

🔗 Relative to the general internet population, Males are **greatly over-represented** at this site.

Confidence: medium

Female

🔗 Relative to the general internet population, Females are **greatly under-represented** at this site.

Confidence: medium

Below Above

Age

Internet Average

18-24

② Relative to the general internet population, 18-24 year olds are **greatly over-represented** at this site.

Confidence: medium

25-34

② Relative to the general internet population, 25-34 year olds are **over-represented** at this site.

Confidence: medium

35-44

② Relative to the general internet population, 35-44 year olds are **under-represented** at this site.

Confidence: medium

45-54

② Relative to the general internet population, 45-54 year olds are **under-represented** at this site.

Confidence: medium

55-64

② Relative to the general internet population, 55-64 year olds are **greatly under-represented** at this site.

Confidence: medium

65+

② No data available for people over 65 years old

Below Above

Has Children

Internet Average

Yes

② Relative to the general internet population, people with children are **greatly under-represented** at this site.

Confidence: medium

No

② Relative to the general internet population, people without children are **greatly over-represented** at this site.

Confidence: medium

Below Above

Education

Internet Average

No College

② Relative to the general internet population, people who did not go to college are **over-represented** at this site.

Confidence: medium

Some College

② Relative to the general internet population, people with some college education are **over-represented** at this site.

Confidence: medium
Graduate School

② Relative to the general internet population, people who went to graduate school are **under-represented** at this site.

Confidence: medium
College

② The audience for this site among people who went to college is similar to the general internet population.

Confidence: medium
Below Above

Income

Internet Average
\$0 - \$30K

② Relative to the general internet population, people with income less than \$30,000 a year are **over-represented** at this site.

Confidence: medium
\$30K - \$60K

② The audience for this site among people with income from \$30,000 to \$60,000 a year is similar to the general internet population.

Confidence: medium
\$60K - \$100K

② Relative to the general internet population, people with income from \$60,000 to \$100,000 a year are **under-represented** at this site.

Confidence: medium
\$100K+

② Relative to the general internet population, people with income more than \$100,000 a year are **under-represented** at this site.

Confidence: medium
Below Above

Browsing Location

Internet Average
Home

② Relative to the general internet population, people browsing from home are **greatly over-represented** at this site.

Confidence: medium
School

② Relative to the general internet population, people browsing from school are **greatly under-represented** at this site.

Confidence: medium

Work

② Relative to the general internet population, people browsing from work are **under-represented** at this site.

Confidence: medium

Below Above

Ethnicity

Internet Average

African

② No data available for people of african ethnicity

African American

② Relative to the general internet population, people of african-american ethnicity are **over-represented** at this site.

Confidence: low

Asian

② Relative to the general internet population, people of asian ethnicity are **greatly under-represented** at this site.

Confidence: medium

Caucasian

② Relative to the general internet population, people of caucasian ethnicity are **greatly over-represented** at this site.

Confidence: low

Hispanic

② Relative to the general internet population, people of hispanic ethnicity are **over-represented** at this site.

Confidence: low

Middle Eastern

② Relative to the general internet population, people of middle eastern ethnicity are **greatly under-represented** at this site.

Confidence: low

Other

② Relative to the general internet population, people of other ethnicity are **under-represented** at this site.

Confidence: low

Below Above

Audience Demographics

The audience demographics data comes from voluntary demographics information submitted by people in our global traffic panel. The data is for the past 12 months, updated monthly. [Learn more](#)

The demographics data consists of:

- Gender, education, browsing location - available to everyone.
- Age, income, ethnicity and children - only available to subscribers of the Alexa Pro Insight or Advanced plans.

To edit your site's public information you need to Log in and verify ownership of your site.



Founded in 1996, Alexa has a rich history of providing deep analytical insights to benchmark, compare and optimize businesses on the web.

Products

- [Marketing Stack](#)
- [SEO Audit Tool](#)
- [Keyword Difficulty Tool](#)
- [Competitive Intelligence Tool](#)
- [Pricing](#)
- [Toolbar](#)
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[Privacy Terms](#)

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

In the High Court, Queen's Bench Division		A43
Claim no.		
Fee Account no.		
Warrant no. (if applicable)		
Claimant's name (including ref.)	SAMUEL COLLINGWOOD SMITH	
Defendant's name (including ref.)	Unknown see particulars	
Date	15/05/2016	

1. What is your name or, if you are a legal representative, the name of your firm?

SAMUEL COLLINGWOOD SMITH

2. Are you a ☒ Claimant ☐ Defendant ☐ Legal Representative
☐ Other (please specify)

If you are a legal representative whom do you represent?

N/A

3. What order are you asking the court to make and why?

1. Permission to serve the Defendants by email and out of the jurisdiction per CPR 6.15, 6.31, PD 6 3.1 (2) and (9). 2. An interim injunction order requiring them to make no further publications of the libels complained of and take down the page complained of. Full grounds are set out in the attached statement.

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☐ at a hearing ☒ without a hearing
☐ at a telephone hearing

6. How long do you think the hearing will last? Hours Minutes
Is this time estimate agreed by all parties? ☐ Yes ☒ No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

N/A - Without notice per grounds.

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

N/A

10. What information will you be relying on, in support of your application?

A44

- ☐ the attached witness statement
- ☒ the statement of case
- ☒ the evidence set out in the box below

If necessary, please continue on a separate sheet.

Statement of Truth

(I believe) (The applicant believes) that the facts stated in this section (and any continuation sheets) are true.

Signed _____ Dated _____
Applicant('s legal representative)('s litigation friend)

Full name _____

Name of applicant's legal representative's firm _____

Position or office held _____
(if signing on behalf of firm or company)

11. Signature and address details

Signed Sam Smith Dated 15/05/2016
Applicant('s legal representative's)('s litigation friend)

Position or office held SAMUEL COLLINGWOOD SMITH
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

11 By the Mount Welwyn Garden City Hertfordshire									
Postcode	<table border="1"><tr><td>A</td><td>L</td><td>7</td><td></td><td>3</td><td>S</td><td>Y</td><td></td></tr></table>	A	L	7		3	S	Y	
A	L	7		3	S	Y			

If applicable	
Phone no.	07792 252569
Fax no.	
DX no.	
Ref no.	

E-mail address	sam_smith@highflier.me.uk
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IN THE HIGH COURT, QUEEN'S BENCH DIVISION
ROYAL COURTS OF JUSTICE

CLAIM NUMBER _____

BEFORE MR / MRS JUSTICE

DATED __ MAY 2016

BETWEEN

SAMUEL COLLINGWOOD SMITH

CLAIMANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'LIKEICARE'

1st DEFENDANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'KIWINULL'

2nd DEFENDANT

AND

UNKNOWN DEFENDANTS, OPERATORS OF WEBSITE
ENCYCLOPEDIADRAMATICA.SE

3rd DEFENDANT

DRAFT / MINUTE OF ORDER

Upon the application by the Claimant dated 15/05/2016

AND UPON READING the written evidence filed

It is ordered that -

1. CPR 6.15 (4) (a) The Claimant has permission to serve the Defendants by emailing all documents in this case as scanned '.pdf' files to contact@encyclopediadramatica.se. To the extent that service is out of the jurisdiction, permission is granted to do so.
2. CPR 6.15 (4) (b) Any document served as above will be deemed served when the email application treats it as been sent.
3. CPR 6.15 (4) (c) the Defendants will have 14 days from service to file and acknowledgement, defence or admission. If the Defendants file an acknowledgement within 14 days, they will have 28 days from service to file a defence or admission.
4. The Defendants are ordered on an interim basis to remove all allegations from their website that the Claimant is a paedophile or any form of sex offender, specifically those at <http://encyclopediadramatica.se/>, <http://encyclopediadramatica.se/Vordrak> and not to repeat the allegations in any form. The Claimant may publish this order to deter repetition

Statement Filed on Behalf of – **S SMITH (Claimant)**
 Witness Statement of **S C SMITH**
 Statement Number - **1**
 Referring to Exhibits – **N/A**
 Statement Date – **15/05/2016**

IN THE HIGH COURT, QUEEN'S BENCH
 ROYAL COURTS OF JUSTICE

CLAIM NUMBER _____

BETWEEN

SAMUEL COLLINGWOOD SMITH

CLAIMANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'LIKEICARE'

1st DEFENDANT

AND

UNKNOWN DEFENDANT, PSEUDONYM 'KIWINULL'

2nd DEFENDANT

AND

UNKNOWN DEFENDANTS, OPERATORS OF WEBSITE
 ENCYCLOPEDIADRAMATICA.SE

3rd DEFENDANT

FIRST WITNESS STATEMENT
 OF SAMUEL COLLINGWOOD SMITH
 AND GROUNDS FOR APPLICATION

1. I, Samuel Collingwood Smith of 11 By the Mount, Welwyn Garden City, Hertfordshire, AL7 3SY am the Claimant in these proceedings and I shall say as follows -
2. Where I make statements of fact, except as otherwise stated, these are from my first hand knowledge and belief. It is important to read the Particulars of Claim first.

Service Without Notice and Out of the Jurisdiction

3. This part of the application is made without notice per the rules under CPR 6.15 (3) (b).

4. I do not have the Defendants' real identities or addresses and so propose to serve them online, with the Court's permission.
5. If any are outside the jurisdiction, I must meet the criteria (gateways) set out in PD 6 3.1, I rely on PD 6 3.1 (2) (A claim is made for an injunction(GL) ordering the defendant to do or refrain from doing an act within the jurisdiction.) and (9) (a tort has been committed and damage will be sustained within the jurisdiction).
6. The Defendants in these proceedings deliberately obscure their identities and have refused to identify themselves. I have seen web pages and articles that suggest they are split between the United States, Australia and Europe. It may therefore be that some reside in this country.
7. I understand that a reason the Defendants obscure their identities is because of previous complaints and litigation causing the site to be taken down. A previous UK based administrator Ryan Cleary was also arrested and charged with hacking offences.
8. I have not been able to identify the operators of Encyclopedia Dramatica. Some opposing websites suggest it is a Serbian man called Sabin Grašić and / or an American Brian Richard Zaiger of the United States. The Encyclopedia Dramatica website claims that Zaiger has retired. I eventually spoke to him IRC and he confirmed this is his story. I cannot confirm he or the other man is the administrator. He ignored my request to tell me who does run the website.
9. I cannot find any information at all about KiwiDynastia's identity. There have been several trolling posts and an email sent to me by persons claiming to be sources after I wrote articles about him, but the identities given upon investigation are false and usually vulnerable members of ethnic minorities. He may live in the UK but I cannot confirm this.
10. I believe that LikeICare may be an Australian man called Christopher Peter Jones but I have not been able to confirm this.
11. In *Slutsker v Romanova* [2015] EWHC 545 (QB), Warby J said at 69, "*The graver the imputation the more likely it is to spread, and to cause serious harm. It is beyond dispute that the imputations complained of are all extremely serious.*"
12. Self-evidently in this case the allegations could not be more serious.

Interim Injunction in Defamation

13. This application is also made without notice per CPR 25.3(1), if there is 'good reason'. These criteria are further expanded by the well known rule in *Re First Express Ltd [1991] BCC 782* that,

14. *"Giving notice is likely to cause the applicant injustice through delay or action that the respondent or others may take before the order can be made."*
15. The Defendants' actions are likely to cause severe injustice by making it harder for me to find work as an IT contractor and they are the cause of any delay giving notice by actively obstructing it by anonymising themselves and banning me from their main site.
16. The second criteria as set out at in First Express is, *"If so, any damage suffered by the respondent as a result of complying with the order may be compensated by the applicant's undertaking in damages [...]; or the risk of the respondent suffering uncompensatable loss is outweighed by the risk of injustice to the applicant if the order is not made."*
17. I believe the latter criteria applies, fairly obviously, from the evidence.
18. If so, any damage suffered by the respondent as a result of complying with the order may be compensated by the applicant's undertaking in damages (see below); or the risk of the respondent suffering uncompensatable loss is outweighed by the risk of injustice to the applicant if the order is not made.
19. Turning to an interim injunction the rule in law is strict. In defamation, as per *Bonnard v Perryman*, one can only obtain interim relief if the claim is bound to succeed or truth is not alleged, *"Although the courts possessed a jurisdiction, 'in all but exceptional cases', they should not issue an interlocutory injunction to restrain the publication of a libel which the defence sought to justify except where it was clear that that defence would fail. Where the defendant contends that the words complained of are true and swears that he will plead and seek to prove the defence of justification, the court should not grant an interlocutory injunction unless, exceptionally, it is satisfied that the defence is one which cannot succeed. The plaintiff must demonstrate that 'it is clear that (the) alleged libel is untrue'".*
20. Clearly this is such a case because I am neither convicted nor (as far as I am aware) under investigation for any such crimes. The Defendants have not indicated justification, per the pleadings their response to a letter of claim posted under their procedures was 'fuck off'.
21. The relief sought is not moot. It does not matter if the Defendants prove to be in many jurisdictions or initial ignore an injunction because if interim relief is granted companies such as Google will de-index the site per their policies.
22. This in turn will likely encourage the Defendants to remove the statements complained of.
23. I would also rely on the balance of the parties' rights under the Human Rights Act 1998. Specifically, the publication of lurid and baseless allegations that I am a

paedophile endanger my article 8 rights to a family life and to employment. They could put me at risk of violence and permanent physical harm. Set against that is the right of a satirical website known for contentious statements and arrests.

24. If it is necessary that I give a cross-undertaking in damages, I give it.

Duty of Candour

25. The website owners are likely to argue that they are out of the jurisdiction. One Bureaucrat, 'Mantequilla', has said they are not in Britain or the US. However, they have not said what jurisdiction they are in and inquiries to several staff have not received a response.

26. The website owners may argue their article is satire of my own work and their website has a disclaimer that it is satire. I have written articles accusing people of paedophilia, usually after they have boasted of it or been convicted.

27. I am very careful to check my facts, and usually link archived logs or similar. The court will need to decide whether it is clear the page is satire, having regard to my evidence that they usually phrase real allegations of wrongdoing in the same terms.

28. There was, as I say at paragraph 22 of the Particulars, a mistake in the letter of claim. It is not generally permitted to issue a claim for one amount and then increase it later, which could be an abuse. However as per the particulars this has been corrected pre-issue.

Statement of Truth

I believe that the facts stated in this Witness Statement are true.



Signed

Date 15/05/2016