

IN THE CIRCUIT COURT OF HANCOCK COUNTY

STATE OF MISSISSIPPI

TROUT POINT LODGE, LIMITED, )  
 A Nova Scotia Limited Company; )  
 VAUGHN PERRET and )  
 CHARLES LEARY, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 DOUG K. HANDSHOE, )  
 )  
 Defendant. )

FILED

MAR 26 2012

KAREN LADNER RUHR  
 CIRCUIT CLERK, HANCOCK CO.  
 BY  D.C.

Civil Action No.: 12-0103

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012




---

**G. GERALD CRUTHIRD, Esquire**  
 Mississippi Bar No. 7926  
 G. GERALD CRUTHIRD, P.A.  
 Attorneys at Law  
 P. O. Box 1056  
 121 Fourth Street  
 Picayune, MS 39466  
 Telephone: (601) 798-0220  
 Facsimile: (601) 798-4591  
 Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

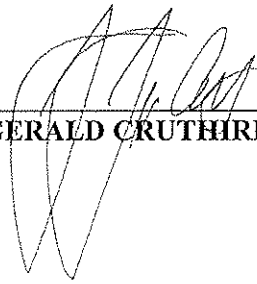
**COUNSEL FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

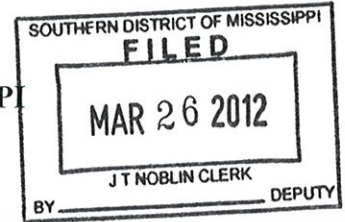
I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire  
Mississippi Bar No. 1774  
Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
2510 14<sup>th</sup> Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaird@joneswalker.com](mailto:hlaird@joneswalker.com)  
*Attorneys for Plaintiff*

THIS the 26<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
**G. GERALD CRUTHIRD**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



TROUT POINT LODGE, LIMITED, )  
A Nova Scotia Limited Company; )  
VAUGHN PERRET and )  
CHARLES LEARY, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
DOUG K. HANDSHOE, )  
 )  
Defendant. )

Civil Action No.: 1:12cv90 LG-JMR

**DEFENDANT'S NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1441 *et seq.*, Defendant, Doug K. Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and states as follows:

1. On March 8, 2012, Plaintiffs' filed their Motion to Enroll Foreign Judgment in the lawsuit styled *Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe*, Civil Action No. 12-0103, in the Circuit Court of Hancock County, Mississippi.

2. The Defendant, Doug K. Handshoe, was served with notice of such filing on or about March 9, 2012.

3. Removal is proper under 28 U.S.C. § 4103, because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via the internet by Defendant in securing rendition of a foreign judgment against Defendant in the Supreme Court of Nova

Scotia, Canada on or about February 2, 2012; and in response thereto Defendant has filed his suit in this Court, styled *Slabbed New Media, LLC, a Mississippi LLC, Douglas Handshoe vs. Trout Point Lodge, Limited, a Foreign Limited Company; Charles Leary and Vaughn Perret*, Civil Action No. 1:12-CV-00038-RHW, filed in the United States District Court for the Southern District of Mississippi, Southern Division, under the provisions of the Securing The Protection Of Our Enduring and Established Constitutional Heritage Act, pursuant to 28 U.S.C. Sections 4101, *et seq.*

4. Venue is proper in this district under 28 U.S.C. § 1441(a) because the State Court where the action has been pending is located in this district.

5. This Notice is being filed with this Court within thirty (30) days after Defendant received a copy of Plaintiffs' initial pleading, Motion to Enroll Foreign Judgment.

6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above described State Court action are attached hereto as Exhibit "A"; and that no other process, pleadings, or orders have been served upon Defendant to date in this action.

7. Defendant files this Notice without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.

8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which it may be justly entitled.

DATED: March 23, 2012

Respectfully Submitted,



---

**G. GERALD CRUTHIRD, Esquire**  
Mississippi Bar No. 7926  
G. GERALD CRUTHIRD, P.A.  
Attorneys at Law  
P. O. Box 1056  
121 Fourth Street  
Picayune, MS 39466  
Telephone: (601) 798-0220  
Facsimile: (601) 798-4591  
Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

**CO-COUNSEL FOR DEFENDANT**

**JACK E. "BOBBY" TRUITT, Esquire**  
The Truitt Law Firm, L.L.C.  
149 North New Hampshire Street  
Covington, LA 70433-3235  
Telephone: (985) 327-5266  
Facsimile: (985) 327-5252  
Mobile: (985) 778-1973  
Email: [btruitt@truittlaw.com](mailto:btruitt@truittlaw.com)

**CO-COUNSEL FOR DEFENDANT,  
APPEARING PRO HAC VICE**

**CERTIFICATE OF SERVICE**

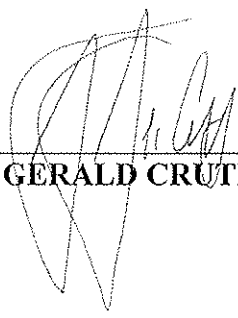
I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Defendant's Notice of Removal to the following:

Henry Laird, Esquire  
Mississippi Bar No. 1774  
Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
2510 14<sup>th</sup> Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaird@joneswalker.com](mailto:hlaird@joneswalker.com)  
*Attorneys for Plaintiff*

and have hand delivered a true and correct copy unto

Karen Ladner Ruhr  
Circuit Clerk of Hancock County, Mississippi  
152 Main Street, Suite B  
Bay St. Louis, MS 39520

THIS the 26<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
**G. GERALD CRUTHIRD**

CERTIFICATE OF CLERK

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

I, Karen Ladner Ruhr, Circuit Clerk of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the complete file in Cause No.

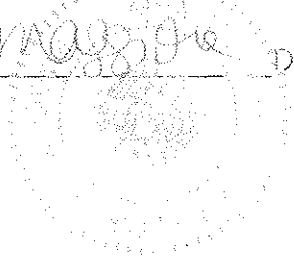
12-0103 styled Trout Point Lodge et al versus Doug K. Handshoe as appears on file in my office this date.

Given under my hand official seal affixed, this the 14th day of March, 2012.



KAREN LADNER RUHR  
CIRCUIT CLERK  
HANCOCK COUNTY, MS

By:  DC



IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

---

MOTION TO ENROLL FOREIGN JUDGMENT


---

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8<sup>th</sup> day of March, 2012.

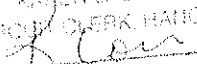
Trout Point Lodge, Limited, Vaughn Perret and  
Charles Leary, Judgment Creditors

By:

  
Henry Laird, Mississippi Bar No. 1774

FILED

MAR 08 2012

CASEN LADNER RUMR  
CIRCUIT CLERK, HANCOCK CO.  
BY  D.C.

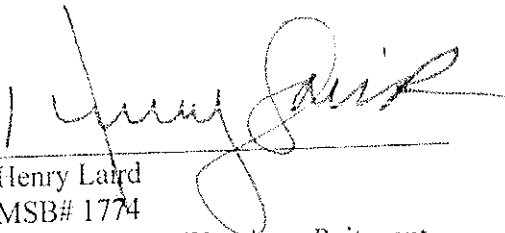


CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe  
345 Carroll Avenue  
Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.



Henry Laird  
MSB# 1774  
Jones, Walker, Waechter, Poitevent,  
Carrère & Denègre, LLP  
2510 14th Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: [hlaird@joneswalker.com](mailto:hlaird@joneswalker.com)

2011

Yr. No. 1335



IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jana Doe

Plaintiffs  
Defendants



ORDER

Before the Honourable Justice Suzanne Hood in chambers:

A motion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

- to Trout Point Lodge: \$75,000 in general damages
- to Vaughn Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;
- to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

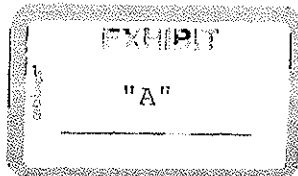
as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.

Dated 7 day of February, 2012.



*[Signature]*  
Prothonotary

Elaine L. d'Entremont  
Prothonotary

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

Elaine L. d'Entremont  
Prothonotary

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: \_\_\_\_\_

DOUG K. HANDSHOE

DEFENDANT

---

AFFIDAVIT OF HENRY LAIRD

---

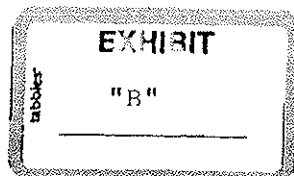
STATE OF MISSISSIPPI  
COUNTY OF HARRISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, says the following things are true:

1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: *Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leary -and- Doug K. Handshoe and Jane Doe*, Yar. No: 353654.

2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of Trout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.

3. The name of the judgment debtor in the above styled case is Doug K. Handshoe, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vaughn Perret is 189 Trout Point Road, Kemptonville, NS BOW 1Y0 Canada.



or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

issued February 2, 2012

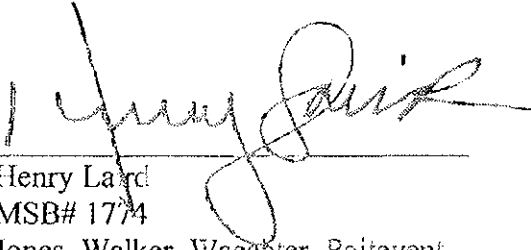
Elaine L. d'Entremont  
Prothonotary

CERTIFICATE OF SERVICE

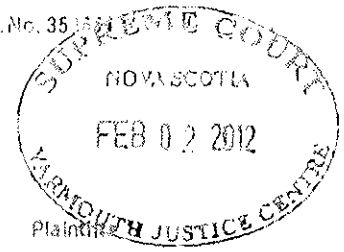
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Doug K. Handshoe  
345 Carroll Avenue  
Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.



Henry Laird  
MSB# 1774  
Jones, Walker, Waechter, Poitevent,  
Carrère & Denègre, LLP  
2510 14th Street, Suite 1125 (39501)  
Post Office Drawer 160  
Gulfport, MS 39502  
Telephone: (228) 864-3094  
Facsimile: (228) 864-0516  
Email: hlaird@joneswalker.com



IN THE SUPREME COURT OF NOVA SCOTIA  
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited  
Company, Vaughan Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Plaintiffs  
Defendants



ORDER

Before the Honourable Justice Suzanne Hood in chambers:

Motion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall pay to the plaintiffs the following damages:

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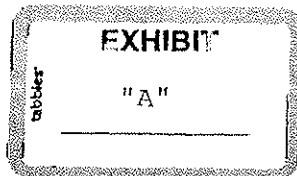
as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particulars, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

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IN THE SUPREME COURT OF NOVA SCOTIA  
I hereby certify that the foregoing document  
is a true copy of the original.

Dated 7 day of February, 2012



*[Signature]*  
Prothonotary

Elaine L. d'Entremont  
Prothonotary

7010 1670 0001 6459 1457

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only. No Insurance Coverage Provided)*

For delivery information visit our website at [www.usps.com](http://www.usps.com)  
**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To Donna Handshoe  
 Street, Apt. No.,  
 or PO Box No. 345 Carroll Ave.  
 City, State, ZIP+4 Bay St. Louis, MS 39520

PS Form 3800, Aug 14, 2005 See Reverse for Instructions

**FILED**

MAR 12 2012  
KAREN LADNER RUHR  
CIRCUIT CLERK, HANCOCK CO.,  
MS D.C.



COVER SHEET

Civil Case Filing Form  
(To be completed by Attorney/Party  
Prior to Filing of Pleadings)

Court Identification Docket #

Case Year

Docket Number

213 1 C 31  
County Judicial Court ID  
District (CH, O, CO)

2012/12

210103

03 09 12  
Month Date Year

Case Number filed by on 1/1/94

Mississippi Supreme Court  
Administrative Office of Courts  
Form AOC/01  
(Rev 2009)

This area to be completed by clerk

In the CIRCUIT Court of HANCOCK County Judicial District

Origin of Suit (Place an "X" in one box only)

- Initial Filing Remanded Reinstated Reopened Foreign Judgment Enrolled Joining Suit/Action Transfer from Other court Appeal Other

Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form

Individual

Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV  
Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of  
Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency

Business Trout Point Lodge, Ltd.

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated  
Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A

Address of Plaintiff 189 Trout Point Road, Kemptville, NS B0W 1Y0 Canada

Attorney (Name & Address) Henry Laird, Post Office Box 160, Gulfport, MS 39502 MS Bar No. 1774

Check (x) if Individual Filing Initial Pleading is NOT in attorney

Signature of Individual Filing:

Defendant - Name of Defendant - Enter Additional Defendants on Separate Form

Individual Handshoe

Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV  
Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of 345 Carroll Avenue, Bay St. Louis, MS  
Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency

Business

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated  
Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A

Attorney (Name & Address) - If Known

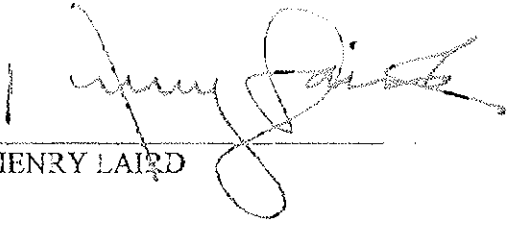
MS Bar No.

Damages Sought: Compensatory \$ Punitive \$ Check (x) if child support is contemplated as an issue in this suit. \*If checked, please submit completed Child Support Information Sheet with this Cover Sheet.

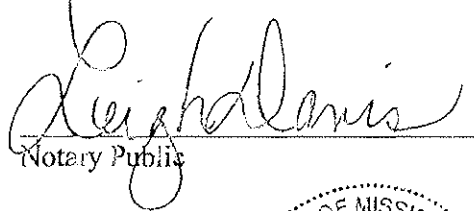
Nature of Suit (Place an "X" in one box only)

- Domestic Relations: Child Custody/Visitation, Child Support, Contempt, Divorce: Fault, Divorce: Irreconcilable Diff., Domestic Abuse, Emancipation, Modification, Paternity, Property Division, Separate Maintenance, Termination of Parental Rights, UIFSA (en 7/1/97; formerly UNESA), Other
Business/Commercial: Accounting (Business), Business Dissolution, Debt Collection, Employment, Foreign Judgment, Garnishment, Replevin, Other
Probate: Accounting (Probate), Birth Certificate Correction, Commitment, Conservatorship, Guardianship, Heirship, Intestate Estate, Minor's Settlement, Mument of Title, Name Change, Testate Estate, Will Contest, Other
Children/Minors - Non-Domestic: Adoption - Contested, Adoption - Uncontested, Consent to Abortion Minor, Removal of Minority, Other
Civil Rights: Elections, Expungement, Habeas Corpus, Post Conviction Relief/Prisoner, Other
Contract: Breach of Contract, Installment Contract, Insurance, Specific Performance, Other
Statutes/Rules: Bond Validation, Civil Forfeiture, Declaratory Judgment, Injunction or Restraining Order, Other
Real Property: Adverse Possession, Ejectment, Eminent Domain, Eviction, Judicial Foreclosure, Lien Assertion, Partition, Tax Sale: Confirm/Cancel, Title Boundary or Easement, Other
Torts: Bad Faith, Fraud, Loss of Consortium, Malpractice - Legal, Malpractice - Medical, Mass Tort, Negligence - General, Negligence - Motor Vehicle, Product Liability, Subrogation, Wrongful Death, Other

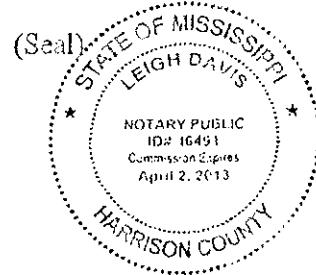
FURTHER THIS AFFIANT SAYETH NOT.

  
HENRY LAIRD

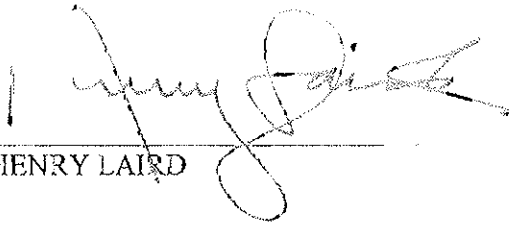
SWORN TO AND SUBSCRIBED before me, this the 8<sup>th</sup> day of March, 2012.

  
Notary Public

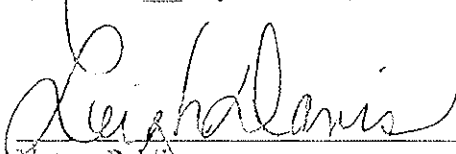
\_\_\_\_\_  
My Commission Expires:



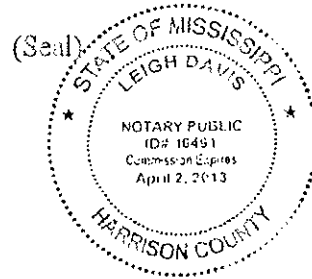
FURTHER THIS AFFIANT SAYETH NOT.

  
HENRY LAIRD

SWORN TO AND SUBSCRIBED before me, this the 8<sup>th</sup> day of March, 2012.

  
Notary Public

\_\_\_\_\_  
My Commission Expires:



IN THE CIRCUIT COURT OF HANCOCK COUNTY  
STATE OF MISSISSIPPI

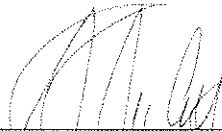
TROUT POINT LODGE, LIMITED, )  
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VAUGHN PERRET and )  
CHARLES LEARY, )  
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Plaintiff, )  
 )  
v. )  
 )  
DOUG K. HANDSHOE, )  
 )  
Defendant. )

Civil Action No.: 12-0103

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012



**G. GERALD CRUTHIRD, Esquire**

Mississippi Bar No. 7926

G. GERALD CRUTHIRD, P.A.

Attorneys at Law

P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220

Facsimile: (601) 798-4591

Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

COUNSEL FOR DEFENDANT



**CERTIFICATE OF SERVICE**

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

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Jones, Walker, Waechter, Poitevent,  
Carrere & Denegre, LLP  
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THIS the 26<sup>th</sup> day of March, 2012.

  
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