

SECOND RESPONSE

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RESPONSE TO HEARST REPLY ECF 19 EXHIBIT A

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EXHIBIT O – In Reference to Submitted Hearst Reply [ECF 19 Exhibit A](#):
Quotes from Judge Stefan Underhill at the James Lawrence v. Altice USA May 9, 2019 Hearing for Motion to Dismiss that was DENIED to Altice by Judge Underhill.

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Appeal Case # 20-393: Table of Contents of Appeal Brief submitted April 10, 2020.

RESPONSE TO HEARST REPLY ECF 19

THE SHORTNESS OF HEARST REPLY ECF 19, WHERE THERE IS VERY SCANT REFERENCE OR EVIDENCE TO THE ISSUES I HAVE BROUGHT UP, SHOWS THE NEED TO ALLOW FOR A PROPER HEARING ON THEIR MOTION TO DISMISS.

I ask for all details of ECF 1 and ECF 17 and now here in ECF 20 to be properly read.

Hearst doubles down thinking our case is **absolutely** similar to my ongoing case against Altice USA. Altice USA has asked for the maximum 90 days to Respond to my April 10 2010 Appeal Brief in Lawrence v. Altice - case # 20-393, so I do not see a proper decision on my Appeal until September 2020. Hearst's ECF 19 Exhibit A shows Altice's original Motion to Dismiss was DENIED. So given the circumstances, I believe it would be in all fairness (emphasis on the word fair as in "fair report" (see Exhibit O)) that Lawrence v. Hearst be given at least the same 1 year time as Lawrence v. Altice was provided to sort out all the unique issues and pressing issues, especially since I have new evidence like the fact of me being not guilty of the arresting charge that was not formally resolved last year during the Altice proceedings. The unique facts of the case at hand Lawrence v. Hearst is already in my corner. The facts I have presented in previous **Complaint ECF 1 and Response ECF 17** speak for themselves. **Among the new Exhibits presented here in Second Response, I want to emphasize ECF 20 Exhibit I, Exhibit J, Exhibit K, Exhibit L and ask for a proper reading of theses and all Exhibits presented.**

Hearst Reply ECF 19:

"Lawrence's unsettling behavior towards them, and with the Westport Police Department's summary of those allegations and Lawrence's prior history of interactions with authorities throughout the country."

HEARST LIES! - *"Lawrence's history of interactions with authorities throughout the country"* – LIE. Just a despicable lie from Defense who obviously has a hard time reading my First Response Exhibit D (see ECF 17 Exhibit D – **FBI Criminal Background Check**) aka National aka "throughout the country" which shows my only conviction in my 54 year old life being a domestic violence conviction from 1996. The ways certain type of lawyers look to deceive the court is utterly nauseating. Defense knows there are no other incident reports from any other town let alone state besides Westport Ct. While living in this area I spend far more time in surrounding towns. I invite Defense to research every major town in the Tri-State area and nation as a whole so to get basic facts of the case straight.

FACT: All alleged "follow at a market/café and get into personal space" incidents were at Westport Ct. markets and only Westport Ct. markets that were fully investigated never resulting in any prior arrest, let alone a criminal conviction as reporter knew from reading the dubiously ascertained Arrest Warrant. These past alleged incidents are cases long closed that prove only one thing – I did nothing criminal let alone anything persistent to which the legal and dictionary definitions of **harassment** clearly state – repeated incidents with a complainant. There was no Course of Conduct behavior for if there was I surely would have been arrested and charged with

something. **The Arrest Warrant clearly does not use such harassment language.**

FACT: As of April 2020, my Connecticut clean record stands firm (see ECF 17 Exhibit D) with the Feb. 6, 2019 false arrest for alleged Second Degree Email Harassment pending that now stands at a Nolle Prosequi destined to be dismissed when the courts re-open due to the facts of Complainant committing multiple acts of perjury. Yes this woman/tenant concocted a false narrative to get me arrested (without a harassing Email under the law aka proper Discovery Evidence) while renting and living within my very own home by deploying the Westport News Article #2 narrative/Big Deuce against me. Yes. Welcome to America – the worst gender war and bitchiest women in the history of mankind. The evidence of how this person/tenant/scorned girlfriend mentions the media slander and libel in her Complaint – 8 times – 8 times she mentions the media slander and libel in her sworn written statement, will eventually become further evidence of the Damages Hearst created that endangered and continues to endanger my life that extends to my very own home every waking day. Yes – that hideous unproven and unprovable Article #2 has made me a target and given the fact I was found not guilty of the arresting incident charge (let alone anything in the past) that started this snowball effect (see ECF 17 Exhibit D – March 2020 Criminal Background Check) – both of which had nothing to do with harassment, you would think Hearst would want to be more objective in how they effect my life.

Hearst Reply ECF 19:

“marginal quibbles with specific word choices cannot serve as the basis for a defamation claim.”

Just utter nonsense - *“marginal quibbles with specific word choice”*. Defamation is mostly about word choice. We are most often the words we know and use. Every occupation has a jargon that defines. Rules are made from words. LAW IS THE WORD.

Latin/Italian: Legge – law

Leggere – to read

English: Diction - [1540s, "a word;" 1580s, "expression of ideas in words," from Late Latin dictionem (nominative dictio) "a saying, expression, word," noun of action from dic-, past participle stem of Latin dicere "speak, tell, say" (source of French dire "to say"), related to dicare "proclaim, dedicate," from PIE root *deik- "to point out" (cognates: Sanskrit dic- "point out, show," Greek deiknynai "to show, to prove," Latin digitus "finger," Old High German zeigon, German zeigen "to show," Old English teon "to accuse," tæcan "to teach"). Another cognate is Greek dike "custom, usage", and, via the notion of "**right as dependent on custom**", "**law, a right; a judgment; a lawsuit, court case, trial; penalty awarded by a judge.**"]

1: verbal description

2: choice of words esp. with regard to correctness, clearness, or effectiveness

3: enunciation

I truly cannot wait until I do not have to read any more nauseous spin like *“marginal quibbles”*. (See the very telling Exhibit L showing what the word harassment produces within various search engines.) Would Defense care to attempt to look for jobs and apply for memberships and

get approved for housing let alone meet people anywhere in the world in this new age of the Internet while that unproven and un-provable **Article #2 slander** exists for the world to read all the while having no arrest record or criminal record related to subject matter of article.

That article came from a biased 21 year-old little girl with obvious gender warring issues looking to opportunistically concoct a hyped story before Due Process and after Due Process. Future Exhibits/Evidence will show she never did a special secondary article on a person arrested (even people with actual criminal history) while reporting on over 25 arrests in her 2 years at the Westport News. (See the very telling Exhibit N of Sophie Cecilia Vaughan reporting on a man arrested for the same charge yet with multiple past arrests yet there is no doxxing of these past arrests let alone special second article aka The Big Deuce). 99% of the time this type of hit job sucker punch is never deployed on someone before Due Process Law let alone after Due Process of Law. Like with my socially scientific evidence on the undeniable definitions of the word **harassment**, over 99% of the time any reporter writes on an arrest they stick to the Official Police Press Release and do not delve into matters best left to a prosecutor and potential jury for if they venture into such material they best know the facts and not put words in the mouths of police like **“Police: Man Harassed Women For Years”** despite police never using such language in the Arrest Warrant nor in any past incident report, for such language definitions would have had a past arrest for some kind of **veritable harassment**.

FACT: Harassment – the word – legal definitions within all states, and the word within all dictionaries is, given all the socially scientific data (see All Exhibits) – clearly a Course of Conduct behavior that does not describe my arrest for one count of Second Degree Breach of Peace.

Hearst Reply ECF 19:

Lawrence’s focus on Hearst’s use of the words “harass” and “haunt” is misplaced (ECF No. 17, at 5-7, 9, 10-12, 47-50); as Hearst noted in its motion papers, the law is clear that Hearst’s use of those terms does not defeat application of the privilege. (See ECF No. 14-1, at 11 (citing Burton v. Am. Lawyer Media, Inc., 847 A.2d 1115 (Conn. App. Ct. 2004); Dellacamera v. New Haven Register, No. CV-436560, 2002 WL 31501855 (Conn. Super. Ct. Oct. 28, 2002)).

Once again, these cases *Burton v. Am. Lawyer Media, Inc* and *Dellacamera v. New Haven Register* were deployed in my case against News 12/Altice USA and never came into the reasoning of Judge Underhill’s Summary Judgment, for the Summary Judgment **was based on a subjective and under-developed dictionary definition of the word stalk** (See Supplement P on my Appeal Brief and Issues before the Second Circuit Court). Judge Underhill clearly shot down these case arguments during the May 9, 2019 Motion to Dismiss to which he DENIED Altice Motion to Dismiss (See Exhibit O) stating that the report was **“not fair”** thereby taking more time to weigh proper evidence in my obviously unique case. As of now Altice is taking the 90 day maximum to respond to my Appeal Brief - July 10, 2020, so I hope to have my particular case against News 12/Altice properly resolved by September 2020. We are presented with similar issues about word choice in James Lawrence v. Hearst with even more Damages all the while knowing of previous **“not fair”** and **“outright false”** reports and resulting Damages. There is no doubt that my case against Westport News/Hearst is different in many ways as written in

Complaint ECF 1 and past Response ECF 17, for Hearst has committed their own types of libel all the while never doing the right thing by taking down their unproven and un-provable coverage of me.

Hearst Reply ECF 19:

“Hearst’s use of the terms “harass” and “haunt” as a shorthand description for that conduct does not materially alter the gist of the Article.”

FACT: Article #2 aka The Big Deuce was done 18 days after my March 5, 2018 arrest and 12 days after the more proper Article #1, plenty of time to get facts. This is not being rushed out like typical shorthand descriptions. It is premeditated actions knowing for nearly 2 weeks about the **“outright false”** News 12 reports.

English: Shorthand - 1: a method of rapid writing by means of abbreviations and symbols, used especially for taking dictation
2: a short and simple way of expressing or referring to something

Yes this report “fell short” to say the least.

I would certainly say -

English idiom: “Dirty lowdown” - dishonest or unfair; vile or despicable; contemptible

... dirty lowdown given the fact Hearst witnessed me being **“outright falsely”** reported on by News 12 and sought another way to perpetuate the Damages by persisting with special coverage beyond the Official Police Press Release that they obviously cannot explain in proper details aka “gist” - the substance or essence of a speech or text, which is the controversially ascertained Arrest Warrant. Deploying the **harassment and haunting language** clearly *“materially alters the gist”* for they are deploying language that the police themselves never deploy in the Arrest Warrant’s carefully chosen words on the arrest and my past run ins. (See Exhibit L)

English: Short - 1: having little length; not long
2: having little height; not tall
3: extending or reaching only a little way
4: brief in duration; not extensive in time
5: brief or concise, as writing
6: rudely brief; abrupt; hurting
7: low in amount; scanty
8: not reaching a point, mark, target, or the like
9: below the standard in extent, quantity, duration, etc
10: having a scanty or insufficient amount of
11: being below a necessary or desired level; lacking

English: Curt - [mid-14c., fr. L. curtus "cut short, mutilated, shortened, incomplete," fr. PIE base *(s)ker- "to cut" (see short).]

1: rudely blunt, brief or abrupt, as in speech or manner: gruff
2: using few words; terse 3: having been shortened

German idiom: Lügen haben kurtz beinen - (literally "lies have short legs")
lies come back to haunt the liar

Just an utterly nauseating experience having to spell out basic common sense legal and common sense definitions in this sick legal game of distorting reason. Is the “gist” of law giving media a license to do life-changing hit jobs in the age of the Internet. The “gist” of the effect of the words deployed aka “impact” aka Damages are at issue, let alone veracity of the terms deployed when reporting on a clearly defined arrest. It is not as if reporter is describing a chaotic and spontaneous incident without time and set definitions aka investigation. NO Hearst is REPORTING ON AN ACTUAL ARREST – CHARGE – LAW – DEFINED WORDS that makes their “*shorthand*” liable to accuracy.

German: richten – to fix

Richter – a judge

richterlich – judicial

richtig – correct, right, real

Richtigkeit - correctness

Bericht – report

berichten – to report, report on

Berichterstatter – (literally a correct actor) a reporter, correspondent

Berichterstattung – reporting

berichtigen – to correct

Gerecht – accurate

Recht – right, law, justice

Gerechtigkeit - justice

FACT: NEW 12/ALTICE USA CORRECTED THEIR March 14, 2018 “OUTRIGHT FALSE” REPORTING BY TAKING IT DOWN FROM THEIR WEBSITES AFTER 2 DAYS. Hearst had the chance to do the right thing and make proper **corrections** (see [Exhibit F on my Email exchange with Hearst legal department 2 years ago](#)) but they chose to double down on Article #2 aka The Big Deuce and destroy my name and life before and after Due Process of Law for 2+ years and counting and most certainly indelibly in many ways.

There are plenty of successful slander and libel cases where news organizations get the arrest wrong (let alone a person’s past) and use “not fair” and “outright false” wording. If someone is arrested and charged for petty theft and reported to be charged for armed robbery that would be actionable if a news organization refuses to do the right thing and correct the report. If someone is arrested and charged for another low-level crime like criminal trespassing but reported on criminal mischief or harassment or stalking, or obscenity, or creation or possession of child pornography, etc... and a news organization refuses to correct the report then yes – those “*marginal quibbles*” (SEE DAMAGES AT COMPLAINT) need to be properly weighed by as many experts as possible – linguistic experts, psychologists, witnesses, surveys, polls, police, etc... JJURY OF MY PEERS. As all evidence and Exhibits show (see [Exhibit L on how the word Harass appears in various Internet Search Engines](#)) aka “*popular acceptations*” and “*mind of the average reader*”- words like **stalk and harass** are a lot more damaging than any other crime. Any reasonable person if having to chose a crime to be forever “*outright falsely*”

reported on would choose all the various forms of theft, robbery, larceny, bribery over **stalking and harassing**. Only murder would be worst, which demands that these **harassing or stalking** Course of Conduct words be given the most serious attention as to all the proper definitions and **“popular acceptance” and “reasonable reader”** connotations.

Hearst Reply ECF 19:

“But the Articles do not mischaracterize the disposition of Lawrence’s run-ins with law enforcement: they do not falsely state or imply that he was convicted of charges stemming from the alleged incidents in other jurisdictions, or that he was charged with the previous ten incidents described in the Arrest Warrant Application”

They do more than imply – they outright write **“Police: Man Harassed Women for Years”** (despite living in San Francisco from 2007-2017) and despite Police never using this **harassing language** in the Arrest Warrant. **Hearst does not even use the proper wording “allegedly”** that comes with a report on an arrest let alone any past “run-in” that was thoroughly investigated resulting in no arrest cases long closed as reporter **knew** at the time of the malicious hit job. The examples of premeditated behavior by Hearst are obvious – they also **knew** I was already damaged from News 12’s “outright false” report and persisted to get “gist” wrong in their own special ways – **veritable persecution aka harassment**. Hearst’s un-provable Article #2 Big Deuce by being unproven after investigations and thus un-provable given statute of limitations will veritably harass me in ways that go beyond any Course of Conduct stalking or harassment law. The effect of this **“marginal quibble”** of word choice does not even have a word strong enough to define the level of harassment/persecution I experience. **The only and best way to get to the “substantial truth” is to put the police on the stand and ask them if they said or believe I “harassed women for years”, to which they will never say for obvious reasons.**

And once again Defense taking liberties and distorting facts – *“charges stemming from the alleged incidents in other jurisdictions”*? All alleged incidents of **“getting into personal space”** happened in Westport Ct. What other jurisdictions? Los Angeles in 1996 I had my only arrest with charges that resulted in one conviction. That is a jurisdiction – single, NOT jurisdictions plural. **(see ECF 17 Exhibit D – FBI Criminal Background Check)**

Hearst Reply ECF 19:

“Reasonable readers understand that some people who are arrested are guilty and that others are not. Reasonable readers also know that in some cases individuals who are arrested will eventually have charges against them dropped.” Martin v. Hearst Corp., 777 F.3d 546, 553 (2d Cir. 2015).”

THIS APPLIES TO ARTICLE #1 – A NEAR PROPER REPORT ON THE ARREST, AND THIS DOES NOT APPLY TO ARTICLE #2 - THE BIG DEUCE WHICH IS A SPECIAL STORY DONE 12 DAYS AFTER ARTICLE #1!!! THE CONTENT OF THEIR ARTICLE #2 DEFINITELY STATES WHILE REPORTING ON AN ARREST THAT I **“Harassed Women for Years”** YET WITH NO PRIOR ARRESTS OR WORDS FROM POLICE RELATIVE TO THEIR SUBJECT MATTER DEPICTING ME AS **HARASSING**. **HOW CAN I BE FOUND**

**NOT GUILTY OF OR HAVE CHARGES DROPPED OF ACCUSATIONS DEVOID OF ACTUAL ARRESTS? THERE IS NO WAY FOR ME TO DISPROVE A REPORT LIKE THIS ARTICLE #2 BIG DEUCE HIT JOB OUTSIDE OF THIS LAWSUIT AND HAVING THE MATERIAL REMOVED!
SEE EXHIBIT L - “REASONABLE READERS”.**

This yet again attempted spin by Hearst is a reason I refrain to debating various cases with them for it is obvious they attempt to flood the court with what they merely can hope are relative but in all actuality intend to confuse the court while never addressing the real issues of libel. After being involved in a similar type of case for the past year I know the press is not privileged to report on people being arrested or charged for things they are not let alone being falsely accused with via the weight of referencing law enforcement (police) of a type of charge or behavior (those “*marginal quibbling words*”).

Had Hearst allowed for Due Process of Law let alone past police investigations Due Processes of Law and refrained from the special Article #2 hit job then this *Martin v. Hearst Corp.* could have some weight. But Hearst once again spins and leaves out essential details to the chains of events and particular issues with my Complaint like the issues of the Article #2 Big Deuce – KNOWING I was already harmed and persisting with even more damaging special hit jobs conflating me with MeToo when my arrest had nothing to do with MeToo that went beyond the arresting charge and Official Police Press Release.

HEARST IS MAKING A DEFINITIVE DECLARATION THAT I “*HARASSED WOMEN FOR YEARS*” WHILE THERE IS NOT ANY MORE DUE PROCESS OF LAW FOR THESE PAST “WOMEN FOR YEARS” CASES TO EXONERATE ME, SO CORRECTIONS WERE MOST CERTAINLY IN ORDER AT THE TIME I CONTACTED THEM 2+ YEARS AGO (see Exhibit F). The “reasonable reader” will not be able to get the facts unless the articles are re-written to which they never have been properly corrected to fully describe the past situations in final dispositional ways let alone getting my side of a particular one-sided crime-free incident report let alone having a proper quote from police that they truly believe I *harassed women for years* despite the fact that they never had probable cause to arrest me for anything – Course of Conduct crimes like stalking and harassing or non-Course of Conduct crimes like Breach of Peace.

FACT: Police will never take the stand and say I *harassed any woman/women* because the police Incident Reports of past cases NEVER say this and the police past actions NEVER say this. This case belongs in front of a jury so police can take the stand for this is Hearst’s only chance to prove anything they wrote.

Once again, I can write for pages upon pages of how these perpetrators of obvious slander and libel distort, spin, deviate, evade, obfuscate, confuse, damage and harm and YES mentally abuse me. Having to explain common sense in multiple pages is truly mentally abusive. I feel I am burdened to explain common sense like that the sun is yellow, sky is blue, etc... yet being told that the sun is purple, sky is green etc... “*outright false*” or “*not fair*” is or “*substantial truth*” is Just an utter mentally abusive experience. THE TRUTH IS IN THE DAMAGES. THE TRUTH IS IN THE ZEITGEIST. TRUTH WILL BE IN A TRIAL AND JURY OF OUR

PEERS.

FACT: I have a clean record in relation to the material thrown at me and if this is not corrected then I will be unjustly burdened with having to explain essential details to all prospective employers let alone people in general who as the *“reasonable reader”*, in the time of break neck speed Internet access, WILL MOST OFTEN NOT BELIEVE ME, especially with a news report claiming that police said this – *“Police: Man Harassed Women for Years”*.

BUT JAMES WHY DID YOU NOT WIN YOUR CASE AGAINST THE MEDIA IF POLICE DID NOT SAY THIS?

Because a Judge sought to define me outside of the established facts and impose his/her own opinion on past incidents without any proper proof with reasonable evidence after already fully investigated aka carried out Due Processes Law. SO I GUESS I HAVE TO CHANGE MY NAME AND LEAVE THE COUNTRY EVEN IF POLICE NEVER SAID I ENGAGED IN HARASSING BEHAVIOR LET ALONE COMMIT ANY PAST CRIME.

WOW REALLY. SO THERE IS REALLY NOT MUCH JUSTICE IN AMERICA?

YES. American Justice often looks out for the rich at the expense of the poor. There is no other alternative outside of putting myself in dangerous situations and taking compounding examples of mental abuse as the pariah Hearst has already made me to be. SO YES I have to change my name after 55 years because this imbalanced, biased, and outright sick gender warring zeitgeist that allowed a 21 year old feminist reporter to *“substantially”* conflate me ([see Coming Exhibits on this Reporter](#)) with MeToo sex-harassment cases that dominate the media at the time of my 2018 arrest. Yes the outbreak of the pussy hat wearing women marchers and resulting Nasty Women movement looking to use their new political powers in as many ways as possible. YES TRULY UNLIKE ANY OTHER TIME – A PERFECT STORM OF THE NEW AGE OF THE INTERNET, I-PHONES AND SOCIAL MEDIA, AND WOMEN AGENDAS POINTING THE #2 FINGER LIKE NO OTHER TIME AND YES I AM A VICTIM BECAUSE JUDGES OF THE TIME REFUSED TO ALLOW A JURY TO TAKE IN ALL THE NEW PHENOMENON AND RESOLVE ALL THE OBVIOUS AMBIGUITIES.

DO NOT MEN HAVE RIGHTS TO BE PROPERLY HEARD?

With all due respect – if Hearst cannot prove I did what they wrote - *“Police: Man Harassed Women for Years”* , then it is time to have Hearst take down their lies from the Internet and properly compensate me for their abusive and life-changing intransigence. Reporting like this obviously hit job also abuses the police and legal system as a whole.

Hearst Reply ECF 19:
.... *“substantially true”*

**English: Substantially – 1: to a great or significant extent
2: for the most part; essentially**

Essence - 1a: the permanent as contrasted with the accidental element of being

- b: the individual, real, or ultimate nature of a thing especially as opposed to its existence
- c: the properties or attributes by means of which something can be placed in its proper class or identified as being what it is
- 2: the most significant element, quality, or aspect of a thing or person
- 3: one that possesses or exhibits a quality in abundance as if in concentrated form

"Truth is stranger than fiction, but it is because Fiction is obliged to stick to possibilities; Truth isn't." — Mark Twain

Hearst Reply ECF 19:

"Hearst's Later Refusal to Remove Its Accurate Publications Does Not Make Its Publication of the Articles Defamatory".

NOT ACCURATE. NOT FAIR. NOT TRUE. NOT IGNORANT OF THE FACTS I PRESENT.

Once again,

PROVE police are saying I harassed women for years.

PROVE any alleged harassing at markets in the past.

PROVE the actual wording of the Arrest Warrant.

PROVE any past "case" had anything to do with harassment.

PROVE that reporter did not omit the word allegedly in her hit job.

PROVE that reporter did not do this special story without bias.

PROVE you know basic laws and basic dictionary definitions.

PROVE you know the "mind of the average reader".

PROVE you know the essence of James Lawrence v. Altice.

PROVE your reporter did not know of my clean Ct. Record.

PROVE your reporter did not know that I was already damaged by her cohort Wendy Higgins Chambers 9 days before your special hit job.

PROVE that there was not any persistence let alone persecution.

PROVE the material your reporter is playing with were never investigated by police.

ETC...

THIS CASE BELONGS IN FRONT OF A JURY.

RESPONSE TO HEARST REPLY ECF 19 EXHIBIT A

Once again, this **ECF 19 Exhibit A** is attempting to do what? Judge Underhill DENIED Altice's Motion to Dismiss saying it was a *"not a fair report"* of the Arrest Warrant. Hearst themselves have similar issues of unfairness compounded with their unique issues like **persisting** after **knowing** of this already *"unfair" and "outright false"* Atltce USA/News 12 report taken down from their websites because the woman who fomented that *"unfair" and "outright false"* news reports (free of any police incident report after police investigation before Hearst's libel) also fomented the 9 day later premeditated **libellous report** by the Westport News. I ask that my submissions of **Exhibit O and Supplement/Exhibit P** in this Second Response be taken into account if necessary:

Exhibit O - In Reference to Submitted Hearst Reply **ECF 19 Exhibit A**: Quotes from Judge Stefan Underhill at the James Lawrence v. Altice USA May 9, 2019 Hearing for Motion to Dismiss that was DENIED to Altice by Judge Underhill.

Supplement/Exhibit P - Questionable Quotes by Judge Underhill Before the Second Circuit Appeals Court and Issues at Hand in James Lawrence v. Altice USA Appeal Case # 20-393: Table of Contents of Appeal Brief submitted April 10, 2020.

Also, as you will read at Hearst **ECF 19 Exhibit A** Judge Underhill's has the opinion that the term **stalking** has a *"very pejorative"* connotation aka worse connotation, thereby Hearst's *"marginal quibbles with specific word choice"* demands as much discussion and analysis as possible. The facts are Hearst should be forced to provide proof that police said I harassed women for years as the title to the Article#2 Big Deuce special hit job before and after Due Processes of Law states *"Police: Man Harassed Women for Years"*. There is only one way to get the un-ambiguous answers to this question and that is a jury of our peers with police taking the stand.

HOW FAIR IS IT THAT I SHOULD HAVE TO SHOW THE "AVERAGE READER" ALL THE INACCURACIES WHILE HEARST IS ALLOWED TO KEEP THEIR UNPROVEN AND UN-PROVABLE LIBEL ALIVE? HOW FAIR IS IT THAT I AM FORCED TO CHANGE MY NAME AT AGE 55 WHILE HAVING NO CONVICTION LET ALONE ARREST OF THINGS HEARST REPORTS ON? HOW FAIR IS IT THAT I CANNOT APPLY FOR FUTURE POSITIONS/VARIOUS JOBS ALL THE WHILE HAVING A CLEAN RECORD IN REGARD TO THE OBVIOUS LIBEL?

CONCLUSIONS

Does Hearst have something like the following by their special Big Deuce hit job articles to which News 12 posted after their “*not fair*” and “*outright false*” coverage.

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WEATHER TOP STORIES CRIME VIDEOS FOOD & FUN NEWS 12+ PODCASTS

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We apologize for any inconvenience.

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NO THEY DO NOT!!! But justice will see to it that Hearst will be at least be posting an apology for their unique persistence and malicious mistakes all before and after Due Processes of Law. I ask that Hearst either stand by their own special accusations and actually prove that police said I **harassed or harassed women for years or take down their libel and begin the process of dulling the impact of the Damages they perpetuated for 2+ years with proper remedial efforts.**

PROVE YOUR SPECIAL HIT JOB!!!

The facts are that Hearst cannot prove I **harassed** anyone especially before their Big Deuce Article #2. All prior cases actually had police investigations that resulted in no probable cause for arrest now with cases long closed with statute of limitations in effect. The fact there were past police investigations gives Hearst more facts than any random woman's “*marginal quibbles with specific word choice*” without investigation. If I am forced to live with this unproven and un-provable injustice alive and breathing for all eternity despite NEVER being arrested for harassing women (prior to the later corrupt false arrest of Feb. 6, 2019) let alone found guilty of harassing woman/women, how is this special unproven and un-provable coverage fair of an actual arrest? My factual “Arrest Record” let lone Criminal Background Check as shown in Exhibits attest to these facts, and potentially being forced to change my name is a huge injustice. Hearst empowering a reckless, opportunistic, and grossly biased reporter is not justice given all the proper details shown in all my **Exhibits from First Response ECF 17 and Second Response ECF 20 and Future Exhibits** showing the state of mind of Reporter at the time of the libel. I deserve a proper trial to show all the necessary evidence. I deserve a jury of my peers aka “average reader” so to present the entire un-avoided chain of events, characters, and all the issues of the obviously biased zeitgeist unlike any other time.