

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction has been served upon:

William F. May, Attorney at Law
Culbertson & Associates
315-F Spring Garden Street
Greensboro, NC 27401

by enclosing it into a properly addressed envelope, first class postage prepaid, and depositing the envelope in the United States Mail in Waller County, Texas, on the 25th Day of February, 2015.

By: _____

Connie L. Schmidt



NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
15 CVS 2791

LEONARD COLDWELL,)
)
Plaintiff,)
)
vs.)
)
CONNIE SCHMIDT, TRENT)
TOULOUSE, RATIONALWIKI.COM,)
SALTYDROID.COM,)
JASON MICHAEL JONES,)
WHOIS.COM,)
)
Defendants.)
)

**MEMORANDUM IN SUPPORT OF
DEFENDANT SCHMIDT’S
MOTION TO DISMISS
FOR LACK OF
PERSONAL JURISDICTION**

Pursuant to Rule 12(b)(2) of the North Carolina Rules of Civil Procedure, Defendant Connie Schmidt (“Schmidt”), *pro se*, submits this Memorandum in Support of her Motion to Dismiss for Lack of Personal Jurisdiction.

INTRODUCTION

In North Carolina, “[a] plaintiff bears the burden of establishing that some ground exists for the exercise of personal jurisdiction over a defendant.” *Jaeger v. Applied Analytical Indus. Deutschland GMBH*, 159 N.C. App. 167, 170 (2003). Plaintiff has pleaded no grounds for this court to exercise jurisdiction over Schmidt, because no grounds exist.

FACTUAL BACKGROUND

Plaintiff Leonard Coldwell (“Plaintiff” or “Coldwell”) claims to be a doctor and “natural cures” expert who has either cured or “seen” over 35,000 patients with an incredible 92.3% or greater cancer cure rate; the claims vary from one site to another. (Attached as EXHIBITS A, B, and C to Affidavit of Connie Schmidt.) This case focuses on various Internet articles that criticize and question Plaintiff’s apparent lack of legitimate credentials, his extravagant claims about his accomplishments, and his alleged bad actions; it includes articles written by Schmidt. Although some of the content produced by Schmidt has been cited in Plaintiff’s Complaint (mostly through paraphrasing or direct quotation out of context (*Complaint*, ¶ 11)), no articles have been specifically cited.

Defendant Schmidt is a long-time resident of Texas, and is the author of a humorous, investigative and frequently opinionated hobby blog, cosmicconnie.blogspot.com (“Whirled Musings”), which is hosted on Google’s free blogging platform, Blogger. Schmidt has been writing Whirled Musings since July 2006 under the intentionally ironic moniker, “Cosmic Connie,” though her full real name also appears in a prominent position on the blog. Whirled Musings’ primary subject matter encompasses “new age”/self-help/pop-psychology/pop-spirituality/alternative-health/conspiracy-theory and related topics, particularly as they pertain to what Schmidt believes to be scams and scammers.

Schmidt is not the owner of cosmicconnie.com, as erroneously insinuated in the Complaint (¶ 8), nor does she have any control whatsoever over blogging platform owner Google’s assignment of country-specific domains such as .jp (Japan), as cited in the Complaint (¶ 8). Schmidt knowingly registered only cosmicconnie.blogspot.com with Blogger in July 2006,

and every other domain pointing to Whirled Musings, or aggregating content from Whirled Musings, is beyond her control.

Whirled Musings is published by Schmidt as a public service and is noncommercial. There are currently no advertisements displayed on Whirled Musings. From spring of 2009 through the end of 2014 Schmidt participated passively in the free version of the Google AdSense program, which placed a single one-column-wide, plain banner ad (all text, no pictures) on the Web version but not the mobile versions of Whirled Musings. Schmidt never had any control over the ad content and never attempted to exercise any control or to increase the paltry revenues in any way. She suspended the program in early 2015. Since March 2010, via a donation button and a humorously self-deprecating donation request, Whirled Musings has also solicited donations, which have been sporadic and very modest, and in exchange for which the donors receive no merchandise, services, tax exemptions, or tangible benefits of any kind. Schmidt never has been paid by anyone to write or maintain any article on Whirled Musings.

Readers cannot register on Whirled Musings; and no database of users, or mailing list, is maintained. The site's only function is the worldwide publication of complex information in the form of parody or satire; humorous and often "snarky" opinions based upon the words and actions of the subjects being written about; and factual information and informed opinions, with live links to and/or screen shots of source material.

Schmidt has no commercial or personal contact with the state of North Carolina (see attached Affidavit of Connie Schmidt), and Plaintiff has alleged none.

Since 2009 Schmidt has written numerous posts on Whirled Musings about convicted and currently imprisoned fraudster and infomercial king Kevin Trudeau and his massive Global Information Network (GIN) scheme. Plaintiff Coldwell initially came to her attention as a blog

subject due to his long-time business and personal association with Trudeau (including Plaintiff's and Trudeau's claim that Plaintiff was Trudeau's "personal physician in Europe"); and due to Plaintiff's prominence for several years as a featured GIN speaker and manager of an apparently extensive downline in GIN. Schmidt also questioned what she felt to be Plaintiff's extravagant and incredible claims on his own web sites and videos.

During the entire time Schmidt has published blog posts about Plaintiff (May 2012 to December 2014, as of this writing), she has believed that he was living in South Carolina rather than North Carolina, and many of her blog posts reflect that belief (attached as Exhibit D to Affidavit of Connie Schmidt). And in fact Plaintiff's own web sites still list a South Carolina address for contact (attached as Exhibit E to Affidavit of Connie Schmidt). Complaint in the present action was Schmidt's first notice that Coldwell – at least according to the claims in said Complaint – is no longer living in South Carolina.

ARGUMENT

In order for North Carolina courts to exert jurisdiction over a nonresident defendant: 1) the exercise must be authorized by North Carolina's long-arm statute N.C. Gen. Stat. § 1-75.4; and 2) there must be sufficient minimum contacts between the nonresident defendant and the State "so that allowing the exercise of personal jurisdiction [will] not offend traditional notions of fair play and substantial justice." *International Shoe Co. v. Washington*, 326 U.S. 310, 316, (1945).

Jurisdiction over Schmidt is not authorized by North Carolina's long-arm statute, and would not satisfy the requirements of the Due Process Clause. There is no basis for this Court to

exercise either general or specific jurisdiction. Defendant's publishing of a noncommercial website has not opened her up to the jurisdiction of all fifty states.

I. NO BASIS FOR LONG-ARM JURISDICTION

Plaintiff's Complaint does not argue which provision of North Carolina's long-arm statute should confer upon this Court jurisdiction over Schmidt, but there would appear to be none that does.

Section 1-75(3) provides for personal jurisdiction "[i]n any action claiming injury to person or property," but only for those "arising out of an act or omission within this State." No actions in this case have occurred inside of North Carolina.

Section 1-75(4) provides for personal jurisdiction in situations where a foreign act causes a local injury, but only where one of three special conditions are met. Not only are none of those conditions met here, but Plaintiff's injuries are not local to North Carolina. During most of the time in which the alleged harms occurred; Plaintiff was living in South Carolina, and was holding himself out to be a resident of that State.

Section 1-75(1)(d) is the only provision of the North Carolina long-arm statute upon which Plaintiff might rely. North Carolina courts have read this provision to grant "the full jurisdictional powers permissible under federal due process." *Skinner v. Preferred Credit*, 361 N.C. 114, 119 (2006). But federal due process requirements are not remotely satisfied here.

II. GENERAL JURISDICTION NOT PROPER

General jurisdiction exists when the nonresident defendant's contacts with the forum state are not related to the cause of action but the defendant's activities in the forum are sufficiently "continuous and systematic." *Skinner*, 361 N.C. at 122. General jurisdiction requires a "significantly higher" level of contact with the forum state than does specific jurisdiction. *Cambridge Homes of N.C., LP v. Hyundai Constr., Inc.*, 194 N.C. App. 407, 412, (2008)

The analysis here is simple: Schmidt has no contact with North Carolina, and there is no reasonable basis for Plaintiff to argue that North Carolina courts should have general jurisdiction over her.

III. SPECIFIC JURISDICTION NOT PROPER

Specific jurisdiction over nonresident defendants "exists when the cause of action arises from or is related to defendant's contacts with the forum." *Skinner*, 361 N.C. at 122. The minimum contacts inquiry is focused on, "the relationship among the defendant, the forum state, and the litigation ... but it is essential that there be some act by which the defendant purposefully avails himself of the privilege of conducting activities within the forum state, thus invoking the benefits and protections of the forum state's laws." *Buck v. Heavner*, 93 N.C. App. 142 (1989)

Again, the analysis is simple. This cause of action does not arise from Defendant Schmidt's contacts with the forum because she has none. Writing Internet articles about a North Carolina resident (particularly when the writer fully believed said resident to be in South Carolina) cannot be reasonably interpreted as "purposeful availment" in North Carolina.

IV. INTERNET-BASED JURISDICTION NOT PROPER

Plaintiff's Complaint seems to argue that everyone with a website has submitted herself or himself to the jurisdiction of this Court because, "each [Internet] statement constitutes a continuing publication with world-wide, 24/7 accessibility, including accessibility in Guilford County, North Carolina." *Complaint* ¶ 16. But both the Fourth Circuit and North Carolina courts have plainly ruled otherwise. "If we were to conclude as a general principle that a person's act of placing information on the Internet subjects that person to personal jurisdiction in each State in which the information is accessed, then the defense of personal jurisdiction, in the sense that a State has geographically limited judicial power, would no longer exist." *ALS Scan, Inc. v. Digital Service Consultants, Inc.*, 293 F. 3d 707, 712 (4th Cir. 2002).

When considering questions of Internet-based personal jurisdiction, North Carolina courts have applied the sliding-scale model first announced by the Western District of Pennsylvania in, *Zippo Mfg. Co. v. Zippo Dot Com*, 952 F. Supp. 1119 (W.D. Pa. 1997). Under that model, "the likelihood that personal jurisdiction can be constitutionally exercised is directly proportionate to the nature and quality of the commercial activity that an entity conducts over the internet." *Id.* at 1124.

In jurisdictions that apply *Zippo's* sliding scale, "[a] passive [w]eb site that does little more than make information available to those who are interested in it is not grounds for the exercise [of] personal jurisdiction." *Id.* In *ALS Scan* the Fourth Circuit adopted and adapted the *Zippo* model to emphasize the requirement of *purposeful targeting* of the forum state, even for websites that would be characterized as "interactive" on the *Zippo* scale. *ALS Scan*, 293 F.3d at 713.

Applying *ALS Scan* to a case involving alleged Internet defamation, the Middle District of North Carolina explained that it “is well-settled in the Fourth Circuit that accessibility alone cannot establish personal jurisdiction. Rather, under *ALS Scan*, the defendant must *direct* activity into the forum state, with the *intent* to engage in business *within the state* (internal citations omitted).” *Burleson v. Tobak*, 391 F.Supp.2d 401, 414 (M.D.N.C. 2005) See also *Havey v. Valentine*, 172 N.C. App 812 (2005).

In *Young v. New Haven Advocate* a Virginia prison warden sued a Connecticut newspaper in Virginia for libel after receiving unflattering treatment in series of stories, posted to the paper’s website, regarding Connecticut’s transfer of prisoners out of state. *Young v. New Haven Advocate*, 315 F.3d 256 (4th Cir. 2002). The district court found jurisdiction based on Young’s Virginia residency, but the Fourth Circuit applied *ALS Scan* and reversed, holding that “a court in Virginia cannot constitutionally exercise jurisdiction over the Connecticut-based newspaper defendants because they did not manifest an intent to aim their websites or the posted articles at a Virginia audience.” *Id.* at 258-59.

Whirled Musings is an unambiguously noncommercial site that falls squarely into the “passive” category of websites under the *Zippo* analysis. Content on Whirled Musings is not directed at any geographic area, but rather focuses on the unbound and amorphous world of new-age/self-help/pop-spirituality/alternative-health and related scams and scammers. The existence of the Internet has not overturned the last hundred years of jurisdictional jurisprudence. “[T]echnology cannot eviscerate the constitutional limits on a State’s power to exercise jurisdiction over a defendant.” *ALS Scan*, 293 F.3d at 711. Publishing articles on Whirled Musings does not subject Schmidt to personal jurisdiction in North Carolina.

CONCLUSION

Plaintiff Leonard Coldwell's frivolous Complaint is not grounded in law and should be dismissed for lack of personal jurisdiction pursuant to Rule 12(b)(2).

Respectfully submitted this 25th day of February 2015.

By: _____
Connie L. Schmidt



CERTIFICATE OF SERVICE

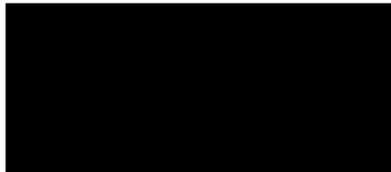
The undersigned hereby certifies that a true and correct copy of this Memorandum in Support of the Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction has been served upon:

William F. May, Attorney at Law
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315-F Spring Garden Street
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By: _____

Connie L. Schmidt



NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
15 CVS 2791

LEONARD COLDWELL,)
)
 Plaintiff,)

vs.)

CONNIE SCHMIDT, TRENT)
 TOULOUSE,)
 RATIONALWIKI.COM,)
 SALTYDROID.COM,)
 JASON MICHAEL JONES,)
 WHOIS.COM,)
 Defendants.)

**AFFIDAVIT IN SUPPORT OF
DEFENDANT SCHMIDT’S
MOTION TO DISMISS
FOR LACK OF
PERSONAL JURISDICTION**

AFFIDAVIT OF CONNIE SCHMIDT

Defendant Connie Schmidt on oath states:

1. I am a current resident of Waller County, Texas and long-time resident of the State of Texas.
2. I do not now and never have owned property in the State of North Carolina, have no family there, and have never even been to North Carolina.
3. I have no business ties in North Carolina and have never done business of any kind in North Carolina.
4. I do not believe that Leonard Coldwell is a properly credentialed doctor, nor that he has cured or attended to more than 35,000 cancer patients with a 92.3% or higher cure rate, as he claims (attached as Exhibits A, B, and C).
5. During the entire time I have published blog posts about Plaintiff (from May 2012 through December 2014 as of this writing), and up until the time I was served with the present Complaint, I believed that Plaintiff was living in South

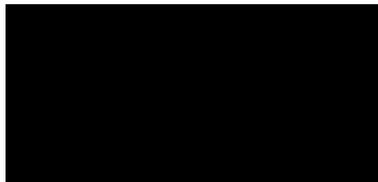
Carolina rather than North Carolina, and all of my blog posts mentioning his state of residence reflect that belief (attached as Exhibit D). Plaintiff's own web sites still list a South Carolina address on the contact information (attached as Exhibit E). Plaintiff's Complaint in this action was my very first notice that Coldwell – at least according to the declaration in said Complaint – is no longer a resident of South Carolina.

6. My website (blog) cosmicconnie.blogspot.com (not cosmicconnie.com as referred to in the Complaint), aka "Whirled Musings," is a hobby blog, hosted for free on the Google-owned platform, Blogger. I have no control over Google's assignments of country-specific domains (e.g., .jp (Japan), as cited in the Complaint).

7. Whirled Musings is a noncommercial blog. From spring of 2009 through the end of 2014 I was on the free version of the Google AdSense program, which placed a single plain, text-only, one-column-wide banner ad on the top of the page (on the Web but not the mobile version of Whirled Musings). I had no control over the ad content and I never attempted to exercise any control over the AdSense program or to increase revenues, which were very minimal. I suspended the AdSense program in early 2015. Since March 2010, Whirled Musings has solicited donations, which are sporadic and sparse, and for which the donor receives nothing in return. I have never been paid by anyone to write or maintain any article on Whirled Musings.

By: _____

Connie L. Schmidt



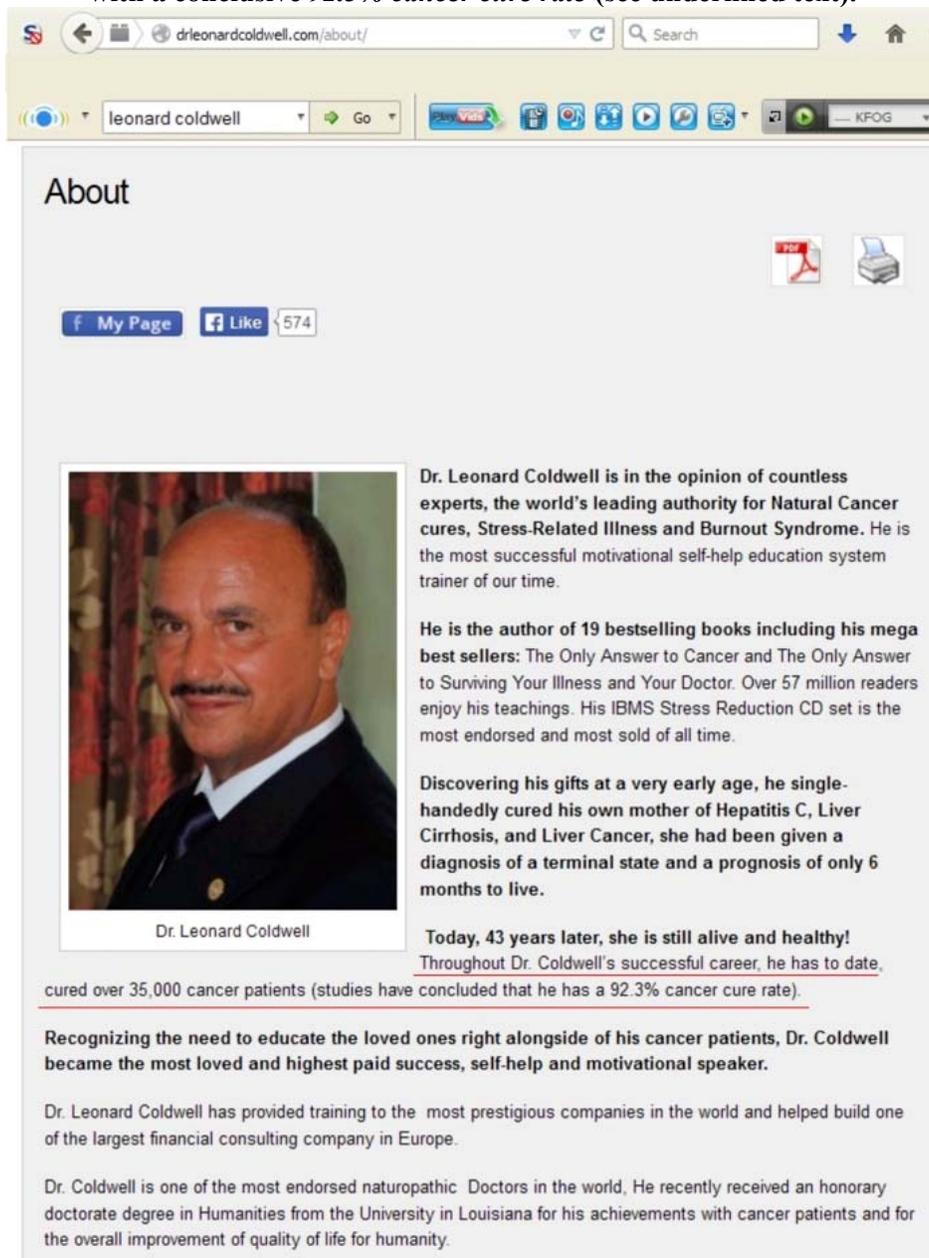
**LEONARD COLDWELL vs. CONNIE SCHMIDT, et al.
Case No. 15 CVS 2791**

From Leonard Coldwell's main web site:

www.drleonardcoldwell.com/about

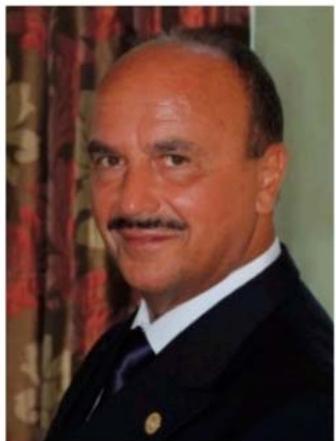
Screen shot taken on February 24, 2015

This version says Plaintiff Leonard Coldwell *cured over 35,000 cancer patients, with a conclusive 92.3% cancer cure rate* (see underlined text).



About

My Page Like 574


Dr. Leonard Coldwell

Dr. Leonard Coldwell is in the opinion of countless experts, the world's leading authority for Natural Cancer cures, Stress-Related Illness and Burnout Syndrome. He is the most successful motivational self-help education system trainer of our time.

He is the author of 19 bestselling books including his mega best sellers: The Only Answer to Cancer and The Only Answer to Surviving Your Illness and Your Doctor. Over 57 million readers enjoy his teachings. His IBMS Stress Reduction CD set is the most endorsed and most sold of all time.

Discovering his gifts at a very early age, he single-handedly cured his own mother of Hepatitis C, Liver Cirrhosis, and Liver Cancer, she had been given a diagnosis of a terminal state and a prognosis of only 6 months to live.

Today, 43 years later, she is still alive and healthy!

Throughout Dr. Coldwell's successful career, he has to date, cured over 35,000 cancer patients (studies have concluded that he has a 92.3% cancer cure rate).

Recognizing the need to educate the loved ones right alongside of his cancer patients, Dr. Coldwell became the most loved and highest paid success, self-help and motivational speaker.

Dr. Leonard Coldwell has provided training to the most prestigious companies in the world and helped build one of the largest financial consulting company in Europe.

Dr. Coldwell is one of the most endorsed naturopathic Doctors in the world, He recently received an honorary doctorate degree in Humanities from the University in Louisiana for his achievements with cancer patients and for the overall improvement of quality of life for humanity.

EXHIBIT A

**LEONARD COLDWELL vs. CONNIE SCHMIDT, et al.
Case No. 15 CVS 2791**

<http://thedrcoldwellreport.blogspot.com/2009/04/dr-leonard-coldwell.html>

This older version states that *it is estimated that Plaintiff Leonard Coldwell worked with over 35,000 patients; no specific cure rate cited (see highlighted text).*

Follow by Email

Email address

Blog Archive

- ▶ 2011 (102)
- ▶ 2010 (311)
- ▼ 2009 (51)
 - ▶ December (3)
 - ▶ November (3)
 - ▶ October (7)
 - ▶ September (8)
 - ▶ August (2)
 - ▶ July (12)
 - ▶ June (10)
 - ▼ April (6)
 - Questions And Answers About Colloidal Silver
 - Colloidal Silver - Immune Booster, Money Saver, & ...
 - Is Your Illness Due To Bad Genes, Bad Luck, or A B...
 - It's Never Too Late To Live Your Dreams!
 - Upcoming Radio Interviews

Dr. Leonard Coldwell

Sunday, April 19, 2009

Dr. Leonard Coldwell



Dr. Leonard Coldwell leading Patient Advocate, expert on cancer and stress related illnesses - Formerly general physician, NMD, PhD, CNHP - Leading health, motivation and success researcher - Consultant and trainer for many companies, organizations, medical institutions, politicians, top athletes and business executives - Founder of the "Modern Therapy Centers" and the "Foundation for Crime and Drug Free Schools and Health for Children". Dr. Coldwell is also President of the World Wellness Organization. For Information about Dr. Coldwell's newest book go to: <http://www.InstinctBasedMedicine.com/>

Biography of Dr. Leonard Coldwell

Dr. Leonard Coldwell is considered as one of the leading authorities for self help education for cancer patients and is called by many authorities the world leading expert for cancer. Dr. Leonard Coldwell is the most endorsed holistic and alternative doctor. His curing rate for so called incurable diseases in Europe is legendary. After sixteen years as a General Practitioner in Europe, Dr. Coldwell left general practice to concentrate on his applied research in stress and stress related diseases, with particular emphasis on cancer and other so called incurable diseases.

While in Europe, Dr. Coldwell was the author of eight bestselling books, countless articles, and hundreds of self-help audio programs. He remains a syndicated columnist with more than seven million readers and continues to author one of the most successful and widely distributed self-help newsletters in Europe. Over two million people have attended his life enhancing seminars. An independent statistical institute **estimated that Dr. Coldwell worked with over 35,000 patients.**

Dr. Leonard Coldwell is the personal physician for Kevin Trudeau in Europe and is the original Natural Cures Doctor. Kevin Trudeau is the New York Times number 1 Bestseller author of his Mega Best Seller: Natural cures they don't want you to know about and refers to Dr. Coldwell and endorses Dr Coldwell's system nearly for every health challenge.

EXHIBIT B

LEONARD COLDWELL vs. CONNIE SCHMIDT, et al.
Case No. 15 CVS 2791

From the public Facebook page of Leonard Coldwell, November 27, 2014:
<https://www.facebook.com/DrColdwell/posts/10203314211482307>
This post states that “new studies” show that Plaintiff Leonard Coldwell’s
“cancer cure rate” is even higher than 92.3% (see underlined text).

 **Leonard Coldwell**
November 27, 2014 · 載

A heart felt "Thank You" to all of my dearest friends:
It is time to say thank you to all my dear friend and supporters. This year was a great year for me and my team. We had a lot of success. I have been on 209 Radio or TV shows this year. My books are now in 9 different languages and my videos have been watched over 229 million times. I have 3 new books coming out and my book The Only Answer to Cancer is in its 10th edition with the new publisher (29th Edition all together) updated and with 90 more pages. I am touring Europe with my personal Heros Dr Simoncini and Dr Bryzinki next year spreading the truth about cancer cures. My newest book in German will be available in January. Our IBMS Masters Society is growing and we are having our next (4th) event this weekend in the most luxurious southern Mansion
<https://ibmsmasterssociety.com/megaseminar/>
It was my most successful year yet and I will always get better. I am so grateful for the huge success of my radio show <http://www2.gcnlive.com/JW1D/index.php/showinfo?showCode=71> I am reaching now millions of listeners from over 150 countries. New studies show that my cancer cure rate is even higher as the 92.3% that was the conclusion of 3 independent studies done before. My book the Only Answer to Cancer is now officially named the most sold book of its kind. My newsletter subscribers are now over 3 million and I will am booked next year for 23 mega seminars and keynote speeches already and of course my Europe tour with the leading cancer cure authorities is so exiting. I won an Award for one of my books and there is a movie in the making about my life called: Life of a Healer! It is a real Hollywood production and will be in Theaters. Yesterday I was on a huge TV show for a 1 hour interview. (will let you know when it airs) I am so grateful for my team, my friends and my family.
All of this is only possible because of your loving support and care. Please sit down today for a moment and reflect on what you are grateful for and if you like put it here as a comment.
Again I am so grateful for all your support, loving comments and emails and your care. I am so thankful for all you caring loving support and uplifting words when a mentally ill women (paid by the pharmaceutical industry to harm my reputation,) was responsible for murdering my loving dog, Blue. Even that 42 million dollars have been spend to destroy my name and reputation and 4 co conspirators (paid by big pharma and the medical industry) bombarded many of you with lies and defamation, you my dear friends stood even stronger with me and supported me even more. That is the proof of what I always say: Success is always the result of effective teamwork! So my dear friends know you know why I am so blessed: Because I have the love and support of my friends and family and the hundreds of thousands of thank you emails, letters and texts.
Yesterday I got a thank you not from a Medical doctor and Professor for Medicine stating that he used the information from my book The Only Answer to Cancer to cure himself from prostate cancer. That my dear friends is what I am living for. Thank you for being there for me when I needed you and to help to spread my message that Every Cancer Can Be Cured withing weeks. Love your Dr C

EXHIBIT C

LEONARD COLDWELL vs. CONNIE SCHMIDT, et al.
Case No. 15 CVS 2791

<http://cosmicconnie.blogspot.com/2014/12/earth-diet-evangelist-v-bourbon-diet.html>

As of the time of writing the referenced blog post on December 16, 2014, Defendant Connie Schmidt still believed that Plaintiff Leonard Coldwell resided in the Charleston/Mt. Pleasant South Carolina area (see underlined text).

But something happened... and it seems clear that as of now Liana and Lenny *are* on the outs, and Lenny has been Facebooking his rage again. (Liana has actually been pretty silent, but then she has more to lose at this point. Lenny has nothing to lose; he has already revealed to the world that he's a nut job.) He chose December 7, the day that Liana had a book signing in his neck of the woods, Charleston, South Carolina, to rage under his own name on the timeline of his friend Sarah Barendse:

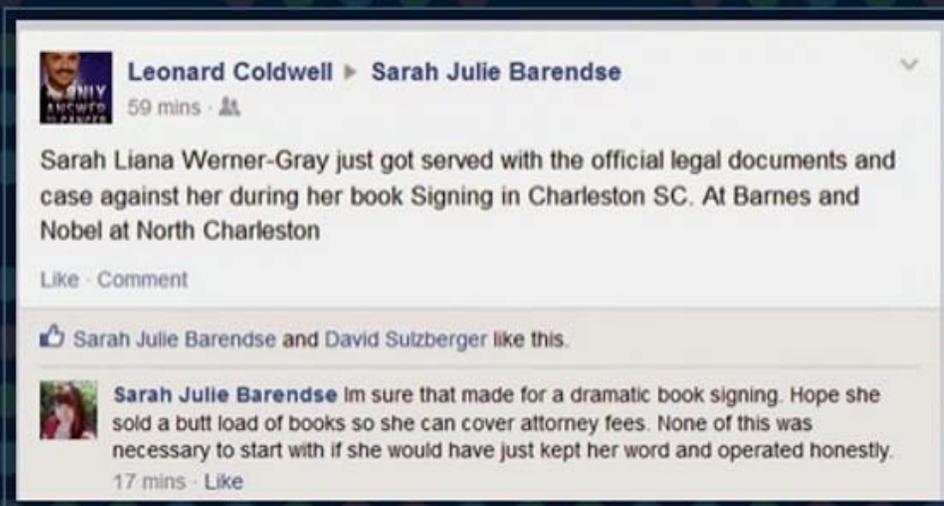


EXHIBIT D

**LEONARD COLDWELL vs. CONNIE SCHMIDT, et al.
Case No. 15 CVS 2791**

From the disclaimer page on Plaintiff Coldwell's main web site:

<http://drleonardcoldwell.com/disclaimer/>

Screen shot taken on February 23, 2015

Plaintiff Leonard Coldwell's web sites currently reflect a South Carolina mailing address.

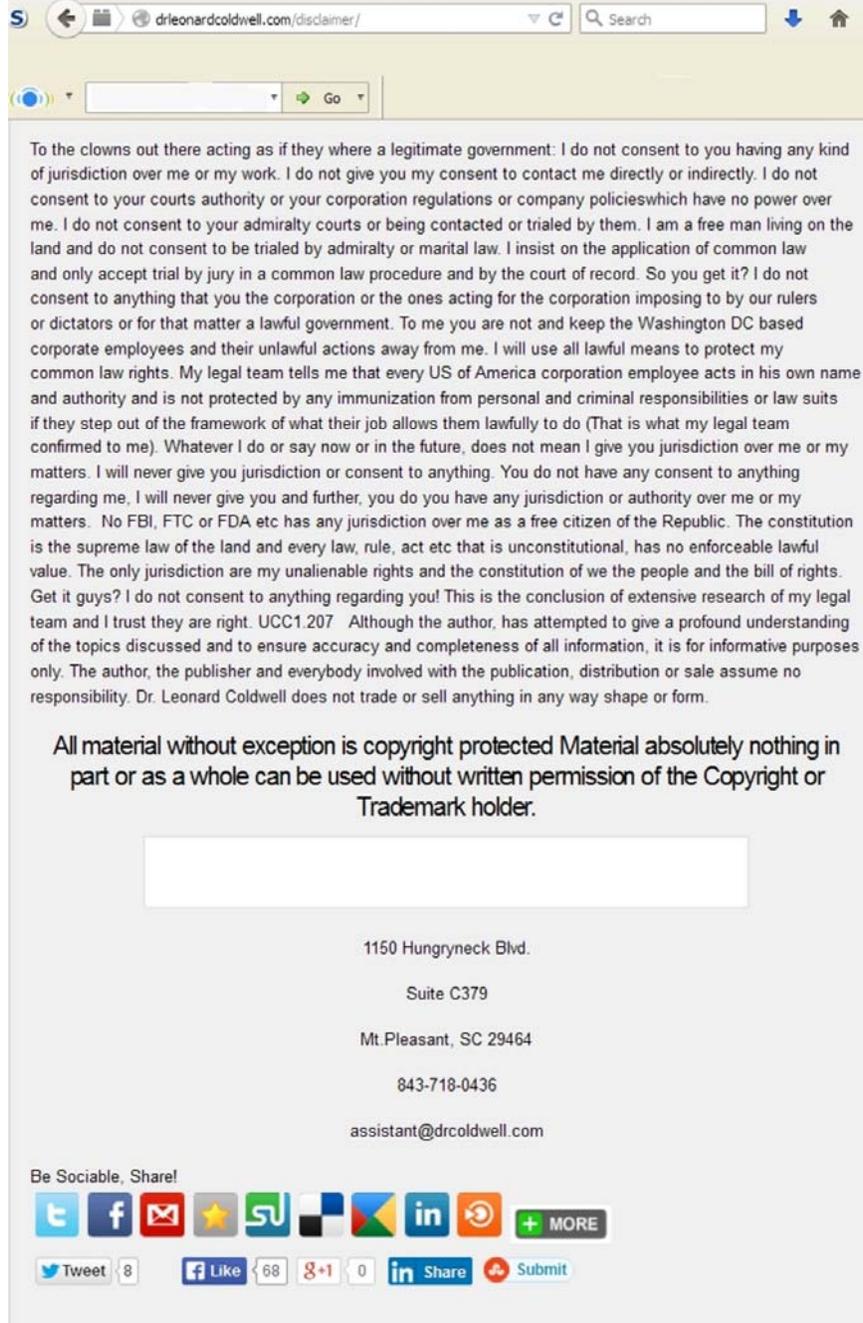


EXHIBIT E

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Affidavit in Support of Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction has been served upon:

William F. May, Attorney at Law
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by enclosing it into a properly addressed envelope, first class postage prepaid, and depositing the envelope in the United States Mail in Waller County, Texas, on the 25th Day of February, 2015.

By: _____

Connie L. Schmidt



CONNIE L. SCHMIDT

VIA FIRST CLASS MAIL

25 February 2015

William F. May, Attorney at Law
Culberstson & Associates
315-F Spring Garden Street
Greensboro, North Carolina 27401

Dear Mr. May:

Enclosed please find my response to your client Leonard Coldwell's Complaint (15 CVS 2791, filed in the General Court of Justice, Superior Court Division in Guilford County, North Carolina). Said response has also been duly delivered to the Court.

Respectfully,

Connie L. Schmidt

Enclosure

