

FILED 11 APR 11 10:54USDC-ORP

United States District Court
District of Oregon
Portland Division

Obsidian Finance Group, LLC
and Kevin D. Padrick

_____))
Plaintiff

))
) Civil Action No. CV 11-0057 HA
Motion for More Definite Statement.

v. Crystal Cox,)

_____))
Defendant

Comes now, **Crystal L. Cox** defendant in error, hereafter defendant, before this court and move this court to require Plaintiff to provide Defendant with a more definite statement of the facts alleged in the complaint pursuant to **Fed. R. Civ. 12(e)** "A party may move for a more definite statement of a pleading to which a responsive pleading is allowed but which is so vague or ambiguous that the party cannot reasonably prepare a response. "

Defendant has written voluminous articles on <http://www.ObsidianFinanceSucks.com> and various other blogs, public forums in regard to plaintiff since July of 2009, Defendant is unaware as to which specific article date or time Plaintiff's complaint refers to.

In Par. 8.a, Plaintiff refers to an alleged statement of Padrick committing fraud against the federal government. Defendant needs a more definite statement about this alleged statement.

In Par. 8.b Plaintiff alleges a statement that defendant said that Padrick "Stole money from the US Government". Defendant is unaware of such statement and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.c, Plaintiff alleges a statement that defendant said Padrick has engaged in "illegal" and "fraudulent" activity. Defendant is unaware of such statements and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

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In Par 8.d, Plaintiff alleges a statement that defendant said Padrick is “Very Corrupt” and has engaged in Corruption, Fraud, Tax Crimes, Solar Tax Credit Crimes.” Defendant is unaware of such a statement and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.e, Plaintiff alleges a statement that defendant said Padrick is a “Liar”. Defendant is unaware of such a statement and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.f, Plaintiff alleges a statement that defendant said Padrick pays off the media and politicians. Defendant is unaware of a such statement and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.g, Plaintiff alleges a statement that defendant said Padrick “did Oregon Attorney Kevin Padrick hire a hitman to kill me?” Defendant is unaware of such statement and needs a **more definite statement** from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.h, Plaintiff alleges a statement that defendant said Padrick has committed “tax fraud”. Defendant is unaware of such statement and needs a more definite statement from Plaintiff as to exactly what Plaintiff is referring to.

In Par 8.i, Plaintiff alleges a statement that defendant said Padrick is is guilty of fraud, deceit on the government, illegal activity, Money Laundering, Defamation, Harassment”. Defendant is unaware of such statements and needs a **more definite statement** from Plaintiff as to exactly what Plaintiff is referring to.

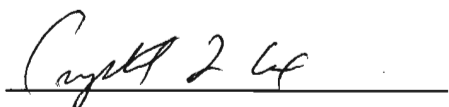
In Par 8.j, Plaintiff alleges a statement that defendant said “Kevin Padrick of Obsidian Finance LLC is a criminal, he has broken many laws in the last 2 years to do with the Summit 1031 case and regardless of the guilt of the summit 1031 principals, Kevin Padrick is a THUG and a thief hiding behind the skirt tails of a corrupt unmonitored bankruptcy court system and protected by corrupt Bend DA and Corrupt Bend Oregon Judges. And I will expose every detail of every law he broke, every secret hand shake and back alley deal.. every solar credit fraud.. every sale to a friend or cronie or real estate consumer money and every indiscretion.” Defendant is unaware of such statements and needs a **more definite statement** from Plaintiff as to exactly what Plaintiff is referring to.

Claim of Relief

Wherefore Defendant respectfully moves this court to require Plaintiffs to provide Defendant with a more definite statement as it relates to Paragraphs **8(a) through 8(j)** in the original complaint. Further Defendant moves this court to strike the complaint if Plaintiff fails to timely provide a more definite statement to each alleged Statements made by defendant.

Dated this 7th Day of April 2011

Crystal Cox, Pro Se
Defendant



Crystal L. Cox
PO Box 505
Eureka, Montana 59917
Crystal@CrystalCox.com

Certificate of Service

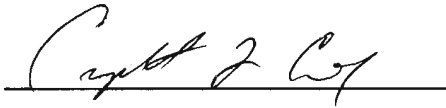
I, Crystal L. Cox do hereby certify that I sent a true and correct copy of the aforesaid Motion for a more definite statement to the Attorney listed below by U.S. Postal Mail on April 7th 2011.

David S. Aman
Tonkon Torp LLP
888 SW Fifth Avenue
Suite 1600
Portland, OR 97204



Dated this 7th Day of April 2011

Crystal Cox, Pro Se
Defendant



Crystal L. Cox
PO Box 505
Eureka, Montana 59917
Crystal@CrystalCox.com

Defendant Travels for Work and Email is the Best, Quickest Method to Receive Communications.

Copy Mailed To:

Honorable Ancer L. Hagerty
1307 United States Courthouse
1000 Southwest 3rd Avenue
Portland, OR 97204-2930

Postnet
P.O. Box 505
Eureka, MT 59917

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United States District Court
District of Oregon
Honorable Aileen L. Haggerty
1307 United States Courthouse
1000 Southwest 3rd Avenue
Portland, OR 97204

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