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5 Attorneys for Plaintiff,
 PROF. ANTHONY NOBLES

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 7
 8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 9 **FOR THE COUNTY OF LOS ANGELES – NORTHWEST DISTRICT**

10
 11 DR. ANTHONY NOBLES, an individual,
 12 Plaintiff,

13 v.

14 KARL RYLL, an individual; HAROLD
 15 KARAKA, an individual; HK ENTERPRISES,
 an unincorporated business; THE REALITY
 16 PIS, an unincorporated business; and DOES 1-
 5, individuals,

17 Defendants,

CASE NO.: LC100903

Unlimited Jurisdiction
 Date Action Filed: October 11, 2013

Assigned for All Purposes to
 Hon. Huey Cotton, Judge
 Dept. D

**SUPPLEMENTAL DECLARATION OF
 JOHN VAN LOBEN SELS IN SUPPORT
 OF PLAINTIFF'S MOTION FOR GAG
 ORDER**

Date: September 12, 2014
 Time: 8:31 a.m.
 Dept.: D

Trial Date: October 20, 2014

1 I, John van Loben Sels, declare:

2 1. I am over the age of eighteen and I am competent to make this declaration.

3 2. I am a partner at Fish & Tsang, LLP ("F&T"), counsel for Plaintiff Prof. Anthony
4 Nobles ("Prof. Nobles"). I oversee all work performed by F&T attorneys and paralegals on this
5 file, in addition to contributing my own work product. The matters stated herein are based upon
6 my personal knowledge of the facts, or otherwise based upon my review of the files maintained
7 at our firm in the ordinary course of business, and if called upon I could and would competently
8 testify thereto.

9 3. On September 8, 2014, Prof. Nobles received an email from Roderick Boyd
10 requesting an interview for a proposed article.

11 4. On September 9, 2014, Prof. Nobles received a second email from Roderick
12 Boyd, which stated that Roderick Boyd is "releasing an article within the week that looks at your
13 multi-year use of diploma mill credentials from fake universities, and your obviously remarkable
14 economic good fortune vs. The experience of your investors in your public and private ventures."

15 5. On September 9, 2014, Prof. Nobles receive a third email from Roderick Boyd
16 with a series of accusatory questions that included statements very similar to the false and
17 defamatory statements made by the Defendants, which are the subject of this lawsuit. Indeed
18 Roderick Boyd even noted that he had "a series of questions that are more specific to legal fights
19 you are, or have been, recently party to."

20 Respectfully submitted,

21 FISH & TSANG LLP

22 

23 Dated: September 9, 2014

24 By: _____

25 John D. van Loben Sels
26 Attorneys for Plaintiff
27 Prof. Anthony Nobles

From: Roderick Boyd <southerninvestigativereporting@gmail.com>
Subject: Re: Hello
Date: September 9, 2014 at 9:21:00 AM PDT
To: "Prof. Anthony Nobles" <anobles@noblesmedical.com>

Anthony,

Here are a few more questions. Given your hectic schedule, I thought I'd be brief. I have others, but these are the main points I seek answers to. To save time, I have embedded links where appropriate:

1. I came across a recent legal filing where you entered diplomas from Redding and Glendale Universities as evidence of your having been awarded two doctorates. You did this months after the schools were shut down by federal prosecutors and a guilty plea was obtained from the founder. Please elaborate.
2. Where did the \$23 million settlement from Abbott go? The last filings from Sutura show about \$12 million in public, marketable securities--what were these, why were they purchased--Sutura was a struggling start-up--and where did they go?
3. While you had a notable transaction in the sale of NMT to MedTronic, it is unclear to me how you sustain your remarkable lifestyle--a 38 Ferrari auto museum, \$250k flight to outer space, lavish Halloween parties, \$350k donation to Sunset Beach community center et al.
4. Inflating and/or misrepresenting academic credentials has posed continual problems for both you and your investors going back into the 1990s. Why?
5. I have a series of questions that are more specific to legal fights you are, or have been, recently party to. They are numerous and specific and writing them all is likely counterproductive. You may contact me by phone should you wish to discuss them.

On Tue, Sep 9, 2014 at 8:34 AM, Editor <southerninvestigativereporting@gmail.com> wrote:
Mr. Nobles, I certainly appreciate a busy schedule and life--mine is crazy too. That said, a few clarifications are in order. I am releasing an article within the week that looks at your multi-year use of diploma mill credentials from fake universities, and your obviously remarkable economic good fortune vs. The experience of your investors in your public and private ventures.

I have other questions as well.

SIRF is not a firm, but a nonprofit Investigative reporting 501c3 whose work has been repeatedly used by regulators. Please look up what media critics like Columbia Journalism Review say about our work.

Roddy Boyd

Sent from my Verizon Wireless 4G LTE DROID

"Prof. Anthony Nobles" <anobles@noblesmedical.com> wrote:

Dear Mr. Boyd,

Thank you for your interest, I am extremely busy right now and do not currently have time available to give to you. However if my schedule frees up in the future it would be helpful to know more about you, your firm and the article you are proposing to write.

Regards,

Anthony Nobles
anobles@noblesmedical.com

On Sep 8, 2014, at 2:17 PM, Roderick Boyd <southerninvestigativereporting@gmail.com> wrote:

Mr. Nobles,

Rod Boyd here. I've left you a few messages at the NMT office and your cell, trying to interview you for a story I'm working on.

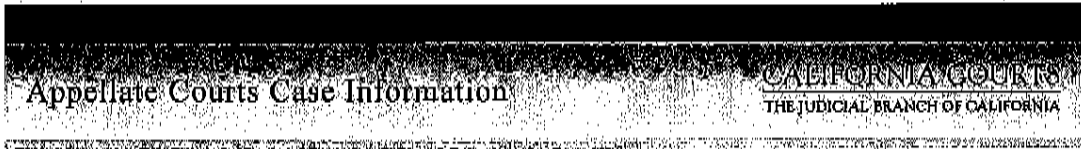
Please call when you free up. My office number is [910-769-2113](tel:910-769-2113) and my cell is [917-514-3897](tel:917-514-3897).

Thank you.

Roddy
[Southern Investigative Reporting Foundation](#)

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Roddy Boyd
The Southern Investigative Reporting Foundation
910-769-2113--office
917-514-3897--cell



2nd Appellate District

[Change court](#)

Court data last updated: 09/10/2014 08:25 AM

Parties and Attorneys

Nobles v. Ryll
Division a
Case Number B256358

Party	Attorney
Anthony Nobles : Plaintiff and Appellant	John David Van Loben Sels Wang Hartmann & Gibbs, PLC 1301 Dove Street, Suite 1050 Newport Beach, CA 92660
Harold Karaka : Defendant and Appellant	Terence Geoghegan Law Office of Terence Geoghegan 385 Maple Street Suite 228 Ventura, CA 93003
HK Enterprises : Defendant and Appellant	Terence Geoghegan Law Office of Terence Geoghegan 385 Maple Street Suite 228 Ventura, CA 93003

[Click here to request automatic e-mail notifications about this case.](#)

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 2603 Main Street, Suite 1000, Irvine, CA 92618

On September 10, 2014, I served true copies of the following document(s) described as **SUPPLEMENTAL DECLARATION OF JOHN VAN LOBEN SELS IN SUPPORT OF PLAINTIFF'S MOTION FOR GAG ORDER** on the interested parties in this action as follows:

Terence Geoghegan, Esq.
The Law Offices of Terence Geoghegan
A Professional Corporation
3585 Maple Street, Suite 228
Ventura, CA 930033504

Attorneys for Defendants

tg@tgtriallawyer.com
Tel: 805-765-9360
Fax: 805-435-7495

BY REGULAR MAIL. I caused such envelopes to be deposited in the United States mail, at Irvine, California with postage thereon fully prepaid, individually addressed to the parties as indicated on the attached service list. I am readily familiar with the firm's practice of collection and processing correspondence in mailing. It is deposited with the United States postal service each day and that practice was followed in the ordinary course of business for the service herein attested to. (C.C.P. § 1013(a)(3))

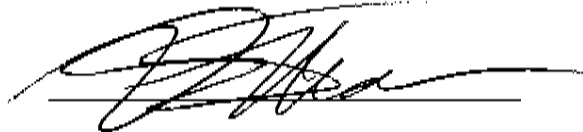
BY FACSIMILE TRANSMISSION. I caused a true copy of the foregoing document(s) to be transmitted to each of the parties on the attached service list at the facsimile machine telephone number as last given by the person on any document which he or she has filed in this action and served upon this office.

BY FEDERAL EXPRESS. I deposited such document(s) in a box or other facility regularly maintained by Federal Express or delivered such document(s) to a courier or driver authorized by Federal Express to receive documents, in an envelope or package designated by Federal Express with delivery fees paid or provided for to the addressees on the attached service list.

BY ELECTRONIC MAIL. I caused a true copy of the foregoing document to be sent via electronic mail in .pdf format, to the individual(s) listed on the attached service list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 10, 2014, at Irvine, California.



Vicki Warren