

☒ **EXPEDITE**

☐ No Hearing is set

☒ Hearing is set:

Date: January 15, 2016

Time: 9:00 a.m.

Judge/Calendar: [REDACTED]

[REDACTED]
CHRISTIAN DOSCHER,

Plaintiff,

v.

JAMES PATRICK HOLDING,

Defendant.

NO. 15-2-01352-9

DEFENDANT'S RESPONSE TO
MOTION TO COMPEL AND FOR
SANCTIONS AND MOTION FOR
PROTECTIVE ORDER AND
CONTINUANCE

I. INTRODUCTION

Defendant, James Patrick Holding, by and through his attorney, [REDACTED]
Y [REDACTED] 1) responds in opposition to plaintiff's motion for sanctions; (2)
moves for a protection order pursuant to CR 26(c); and (3) requests a continuance of both matters so
that plaintiff has adequate notice and time to respond to the motion for protective order, unless waived
by plaintiff. This motion is based upon the records and files herein and the subjoined declaration of
counsel, with attachments thereto.

As established herein, Mr. Doscher has abused the discovery process. His abuses warrant a

1 denial of his pending motion for sanctions and imposition of a protection order pursuant to CR 26(c).

2 **II. DECLARATION OF** [REDACTED]

3 [REDACTED]
4 [REDACTED], make the following statement under penalty of perjury:

5 1. I am the attorney of record for the defendant, James Patrick Holding, and have
6 personal knowledge of all matters stated in this Declaration. I am over the age of 18 years, am a
7 citizen of the United States, and am competent to testify herein. I make this Declaration in support
8 of my client's CR 26(c) motion and in response to plaintiff's motion to compel and for sanctions.

9 2. I was retained in October 2015 to represent Mr. Holding in a lawsuit filed against him
10 on July 16, 2015. My client is and always has been located in the state of Florida, his residence.
11 Plaintiff's complaint alleges defamation based upon communications published on a religious
12 website and blog. Both parties have engaged in vitriolic, back and forth commentary on the internet
13 for over a decade and plaintiff appears to hold a great deal of animosity towards my client.

14 3. When I accepted this case, Interrogatories and Requests for Production had
15 previously been served and a motion to compel was pending. Although the discovery requests were
16 overly long (97 Interrogatories and 98 Requests for Production) I advised my client that because
17 they had been pending for so long, it would be best to simply answer the requests in good faith.

18 4. These requests were answered in good faith, requiring disclosure of hundreds of
19 pages of documents to Mr. Doscher. Before our answers could be completed and served, within the
20 timeframes mandated by a discovery order issued by Judge [REDACTED] Mr. Doscher served a second set
21 of discovery requests, containing another 50 Interrogatories and 50 Requests for Production. Now,
22 Mr. Doscher has served a third set of discovery, containing an additional 57 Interrogatories and 21

1 Requests for Production.

2 5. A true and correct copy plaintiff's Second Interrogatories and Requests for
3 Production is attached hereto as Attachment A. Plaintiff's third set is attached as Exhibit 10 to his
4 motion.

5 6. Mr. Doscher's first set of discovery was replete with unprofessional, self-serving
6 discovery requests, punctuated by antagonistic commentary. A typical Interrogatory was as follows:
7 "Would it be fair to classify you [defendant] as the Ann Coulter of Christian apologetics?"

8 7. A review of both unanswered sets of discovery reveals more of the same. They are
9 clearly designed to improperly harass my client, and are an extension of previous animosities. A
10 typical Interrogatory question (#21 in plaintiff's second set) is as follows:

11 In Post # 97 of the skepticbud thread, you say:

12 *I figured as much myself. His lawsuit against his former employer (Swift) was*
13 *pretty much top to bottom taken care of that way. Yankovic's song is intended as*
14 *a joke, but Bud is literally threatening to sue Colorado because it looks like*
15 *Wyoming. Somehow he has the idea that the legal system is intended to resolve*
16 *his personal conflicts; or else he thinks it's like a personal lottery from which he*
17 *might get a lucky win.*

18 *Based on his recent messages, he plans to sue because he wanted to be able to*
19 *keep his identity "private" while he did to others what he's so upset I did to him.*
20 *Using publicly available records. He files suits like a 2 year old.*

21 In your opinion, what category of frivolity would be involved in a lawsuit seeking damages from
22 Colorado because it looks like Wyoming? Legal, or colloquial? If a two-year old child filled out
and filed the papers necessary to file a lawsuit, would it be frivolous in the *legal* sense, or only in the
colloquial sense? If you answered "legal" to either of these questions, then why did you say so
clearly that "Doscher errs grossly in thinking we refer to his suits being frivolous in legal terms. No
such was made here, or ever has been"? Do not try and escape by crying "calls for a legal

1 conclusion!". First, whether my lawsuits are legally frivolous is a central subject of this libel action.

2 Second, from CR 33(b):

3 *An interrogatory otherwise proper is not necessarily objectionable merely because*
4 *an answer to the interrogatory involves an opinion or contention that relates to fact*
or the application of law to fact ...

5 8. In addition to the harassing, improper nature of Mr. Doscher's pending discovery
6 requests, it is alleged that Mr. Doscher has abused the discovery process by his misuse of
7 information previously provided in response to the first discovery requests. His first set of
8 Interrogatories contained several requests that, in a general sense, required defendant to identify
9 anyone that he might have communicated with, online or otherwise, concerning plaintiff, and to
10 provide any contact information that defendant had for these individuals.

11 9. Defendant complied, providing such contact information as was in his possession.
12 Immediately, thereafter, Mr. Doscher utilized that contact information to send threatening, harassing
13 email communications to the people whose contact information had been disclosed. Attachment B,
14 hereto, is a true and correct compendium of these communications.

15 10. A typical excerpt from Mr. Doscher's communication to a person whose contact
16 information was revealed through the discovery process is as follows:

17 I have sued Mr. Holding in civil court for libel (the written form of defamation).

18 His prior boasting about how he can get this suit dismissed real easy, is bullshit, he
19 has hired a lawyer, and for whatever, reason, the lawyer has decided that answering
20 my discovery requests (which sought personal contact information on you and other
tweb members) was better than simply getting the case dismissed as quickly as
possible.

21 I just received a big packet of evidence from Mr. Holding, and that's how I learned
22 your email address, as well as similar contact information and real life names of
many other tweb members. If you believe Holding is very obstinate and protective
when it comes to his Christian friends, then you have no other option but to believe

1 that Holding did not *willingly* hand over that evidence, it was forced out of him by a
2 lawyer who knew the law better, and who likely told him resistance to discovery
3 would get his ass in real trouble. Today is the day you stopped being impressed by
4 Mr. Holding's boastful lies. If it was so damn easy to get this case dismissed, then
5 why didn't he do that real quick so that he wouldn't have to be the one to unmask
6 his anonymous friends at tweb?

7 11. No case schedule has been issued in this matter and no answer has been filed, as
8 defendant intends to file a CR 12(b) motion challenging plaintiff's jurisdiction in this matter under
9 [REDACTED]ong Arm Statute. Because this motion will rely on some declaratory evidence
10 concerning defendant's contacts with the State of [REDACTED] defendant assumed the court would
11 want the matter scheduled as a summary judgment proceeding, pursuant to the court's new
12 scheduling requirements.

13 12. To that end, our office contacted the court on December 14, 2015, to procure
14 available summary judgment dates. On December 21, 2015, we were informed that the soonest date
15 our motion could be heard was May 6, 2016. We have reserved that date and intend to file our
16 motion in compliance with all other applicable time constraints.

17 13. Plaintiff cites an answer in defendant's first discovery responses that indicates a
18 protection order had "already" been filed. As I explained to plaintiff, the responses were initially
19 drafted with the expectation that a motion was going to be filed before service of our responses.
20 When this did not occur, neither defendant nor my office caught the obvious mistake.

21 14. Nevertheless, given the obvious animosity of plaintiff and his abuse of processes, my
22 client reiterates his objection to full disclosure of his social security number to plaintiff and requests
a protection order addressing this particular withholding.

15. Mr. Doscher's animosities and underlying motivations are further revealed by the fact

1 that he filed his motion for sanctions on January 7, 2015, one day after our office received notice that
2 the [REDACTED] Bar Association had dismissed a grievance filed by Mr. Doscher against
3 opposing counsel.

4 III. ARGUMENT

5 A trial court exercises broad discretion in imposing discovery sanctions under CR 37, and its
6 determination will not be disturbed absent a clear abuse of discretion.” [REDACTED]

7 [REDACTED] (2006). “A trial court abuses its discretion when its order is
8 manifestly unreasonable or based on untenable grounds.” [REDACTED]

9 [REDACTED]
10 [REDACTED] “A discretionary decision rests on ‘untenable grounds’
11 or is based on ‘untenable reasons’ if the trial court relies on unsupported facts or applies the wrong
12 legal standard; the court’s decision is ‘manifestly unreasonable’ if ‘the court, despite applying the
13 correct legal standard’ to the supported facts, adopts a view ‘that no reasonable person would take.’”
14 May [REDACTED]

15 CR 26(c) permits a variety of restrictions when, for good cause shown, “justice requires [an
16 order] to protect a party or person from annoyance, embarrassment, oppression, or undue burden or
17 expense....” [REDACTED] It is to be
18 noted that the limitations or restrictions contemplated by CR 26(c) are dependent upon (1) a showing
19 of good cause, and (2) that justice requires the limitation or restriction. The reasons for protecting a
20 party or person must be found to exist and be stated as such. *Id.*

21 Here, defendant asks the court to find that plaintiff’s abuse of the discovery process, designed
22 to harass and unduly burden him, warrants a protective order preventing further discovery, including

1 depositions. At a minimum, defendant requests that the court enter a protective order against such
2 discovery until defendant's motion for dismissal under CR 12(b) can be heard by the court.

3 Providing this measure of protection would not prejudice plaintiff, as the case is in its early
4 stages, not scheduled for trial. Allowing plaintiff to subject defendant to a continued onslaught of
5 discovery when the case may be most appropriately heard in another jurisdiction will allow
6 unnecessary legal costs to accrue, which seems to be plaintiff's objective.

7 Finally, in light of the clear animosity demonstrated from plaintiff to defendant, and the
8 apparent abuses of discovery information already disclosed, defendant requests that he be protected
9 from disclosing his social security number to plaintiff.

10 IV. CONCLUSION

11 Defendant has filed a civil notice to have its motion heard on January 22, 2016. Defendant
12 moves the court for a continuance of the hearing on motion to compel and sanctions, so that both
13 matters may be considered simultaneously. Defendant's motion for protection order should have
14 been filed sooner, but this does not change the underlying facts which support a denial of sanctions
15 and imposition of the requested limitations and protections against discovery abuse.

16 I declare under penalty of perjury under the laws of the State of [REDACTED] at the
17 foregoing is true and correct.

18 DATED this 13th day of January, 2016, at [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

Attachment A was a copy of the 2nd set of interrogatories, which I have not included in this abridged display.

ATTACHMENT A

ATTACHMENT B

Abuses:

- 1) Profane/threatening email to Amy Garner, 12/6/15 -- Exhibit 1
- 2) Threatening message to Amy Garner on Amazon forums, 12/9/15 – Exhibit 2
- 3) Group email to around 40 people, including 12 whose email he got only by way of discovery, 12/9/2015 – Exhibit 3
- 4) Threatening message to Nick Peter on Amazon forums, including posting his home address, 12/13/15 – Exhibit 4
- 5) Profane/threatening email to Gary Habermas/John Sparks, 12/13/2015 – Exhibit 5
- 6) Email to North American Mission Board, 12/13/2015 – Exhibit 6
- 7) Threatening email to John Sparks, 12/11/2015 – Exhibit 7
- 8) Email to Gary Habermas, 12/14/2015 – Exhibit 8
- 9) 2ND email to Mission Board, 12/14/2015 – Exhibit 9
- 10) Threatening email to Dennington/Barrett (witness intimidation), 12/26/15 – Exhibit 10

EXHIBIT 1

From: Barry Jones <barryjoneswhat@yahoo.com>
To: "amygarner85@yahoo.com" <amygarner85@yahoo.com>
Sent: Sunday, December 6, 2015 3:42 PM
Subject: offer to settle

Hello,

My name is Christian Doscher. I'm the "B&H" who had started that theologyweb thread some months ago about "Does your God approve of pedophilia" before I got banned from there.

I am the person who was mocked and defamed also in that other tweeb thread "The secret identity of Skepticbud" as well as in his website article "Internet Predator Alert".

I have sued Mr. Holding in civil court for libel (the written form of defamation).

His prior boasting about how he can get this suit dismissed real easy, is bullshit, he has hired a lawyer, and for whatever, reason, the lawyer has decided that answering my

discovery requests (which sought personal contact information on you and other tweb members) was better than simply getting the case dismissed as quickly as possible.

I just received a big packet of evidence from Mr. Holding, and that's how I learned your email address, as well as similar contact information and real life names of many other tweb members. If you believe Holding is very obstinate and protective when it comes to his Christian friends, then you have no other option but to believe that Holding did not *willingly* hand over that evidence, it was forced out of him by a lawyer who knew the law better, and who likely told him resistance to discovery would get his ass in real trouble. Today is the day you stopped being impressed by Holding's boastful lies. If it was so damn easy to get this case dismissed, then why didn't he do that real quick so that he wouldn't have to be the one to unmask his anonymous friends at tweb?

You might wish to email Holding and ask why he foolishly delayed getting this case dismissed, if in fact it was as simple to get dismissed as he had boasted months ago at Tweb. It can only be that a real lawyer, and not Holding, recognize my lawsuit is far more serious than Holding boasted about months ago.

My lawsuit puts front and center Holding's "internet predator alert" on me. You'll be disappointed to know that Holding took down that Alert after hiring a lawyer. WHY WOULD HOLDING TAKE THAT ALERT DOWN, IF HE SERIOUSLY BELIEVED HIS ALLEGATIONS THEREIN WERE ALL TRUE OR OTHERWISE IN GOOD FAITH?

It can only be that Holding does NOT seriously believe his Internet Predator Alert contained only truth. His lawyer likely told him that the Alert was actionable in court, thus taking it down was the only way to prepare to convince the jury that he was sorry for what he did. Obstinate pricks like Holding do not reform their ways unless cracked across the head with a 2x4, legally speaking of course.

You have two days to email me back with an apology and a settlement offer of your choice, or I will supply the name amygarner85 to both Facebook and Yahoo! in a subpoena and request any information that leads to your personal contact information, and I will eventually find out where you live for the purpose of having a process server deliver documents to you in the up-coming lawsuit **Doscher v. Garner**.

Don't waste your time fantasizing about how I cannot sue you in my state, I may decide to file the lawsuit in YOUR home state.

You have the option to cease playing hardball whenever you decide that genuine repentance and a mature attitude to these serious matters is more important to your spiritual growth than the dismissive stupid childish mockery you reveled in months ago.

Do I have your attention now? Or will you make me go away by shutting your eyes?

Now think of exactly how stupid you are forwarding this email to Holding and Sparko, when the facts show that their legal advice isn't worth a shit and only gets Holding in so much trouble, he has to go hire a lawyer just to clean up his mess. You are much better off seeking advice from a real attorney, not a mouthy impostor.

Don't like these threats of lawsuit? You should have thought of that before you so belligerently libeled me. You ain't laughing *now*, you stupid bitch.

Christian Doscher

EXHIBIT 2

skepticdude says:

Hey, Christianbookworm, that guy who died for your sins and is now the only reason why you grow spiritually (i.e., James Patrick Holding) has "obviously perverted" the New Testament and ALL Context Group scholarship...according to an email I received from Context Group co-founder Richard Rohrbaugh.

If you don't like the idea of being forced to look for a new religion, you probably should turn away your eyes before you read Rohrbaugh's response at the end of the following quoted email exchange:

----- Forwarded Message -----

On 12/7/2015 6:28 PM, Barry Jones wrote:

> Mr. Rohrbaugh,

snip

> You might be interested to know that your Social Science Commentary is being used by an evangelical apologist, who makes money selling books and promoting himself as an apologist, to establish that there is biblical justification for modern-day Christians to publicly shame/attack/insult those who publicly criticize Christian faith.

>

> For example, in the article where he acknowledges using your work as a guide, he gives the following advice to Christians who are interacting with different types of people:

>

> Private/questioner -- teach them.

> Private/baiter -- avoid them.

> Public/questioner -- teach them.

> Public/baiter -- attack them.

> This is in line with the much broader dichotomy between public and private discourse and encounter in the social world of the Bible.

> Source: <http://www.tektonics.org/lp/madmad.php>

>

> Is there anything at all in any of your published writings, or the published writings of the other Context Group authors, that would support the above-quoted Public/baiter -- attack them conclusion? Of course he doesn't mean physically attack, he only means "shame/insult/rebuke", etc.

>

> You might be even more interested in how says that people who refuse to use riposte in modern American culture are sick and aiding and abetting that sickness:

>

> ""But we should be all things to all men and modify our approach for today's culture."

> Then it's time to give up blood atonement too. No, modern culture has forbidden riposte as a

way to prevent deserved criticism and to silence the critic. To that extent, the culture itself is sick and those who reject valid riposte are themselves aiding and abetting the sickness." (Ibid)

>

> Is he misrepresenting your work there?

>

> You might be wondering what kind of person this "apologist" is. Here is a sample from his early work showing him responding to various people who disagree with his views, and to the best of my knowledge, he refuses to acknowledge that this was unChristlike:

>

> "And you? You're nothing but a sanctimonious ant with delusions of your own grandeur; you're nothing but a modern day Hugh waving your swollen member around and knocking people over with it or else disgusting everyone by pointing to it and shouting to everyone to look at it." ----<http://www.ctm.org/forum/index.php?showtopic=84>

> -----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such language.

<https://web.archive.org/web/20050501231546/http://www.ctm.org/forum/index.php?showtopic=84>

>

> "In your arrogance you missed it; you were so busy waving your giant pee-pee around that you bonked yourself on the head with it and didn't even notice." -----

""<http://www.ctm.org/forum/index.php?showtopic=89>

> -----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such language.

<https://web.archive.org/web/20050501231540/http://www.ctm.org/forum/index.php?showtopic=89>

>

> Swollen member? Giant pee-pee? Shouting at everybody to look at one's uncovered genitalia?

>

> The trouble with this guy is not that he is just "wrong", but that he manages to convince other apparently weak-minded people that he is a giant in the field of bible scholarship despite lacking any formal education in bible related matters. He has a tax-exempt ministry and sells books about the world of the bible and "how to reconcile alleged bible contradictions". I therefore do not think that simply ignoring him fulfills the Christian duty to positively identify false teachers and advertise a refutation of their teachings that mar the image of Christ.

>

> Having your work abused by others is probably something that deserves your attention and commentary, even if only to make sure that he doesn't mislead others regarding Context Group work.

>

> Thanks again for your time, and I hope to find more of your lectures on the internet!

>

> Barry Jones

=====

From: Richard Rohrbaugh <deleted>

To: Barry Jones <deleted>
Sent: Tuesday, December 8, 2015 6:43 PM
Subject: Re: Nahum out of the canon?

I glanced at the stuff on the website. It is obviously a perversion of both the NT and ALL Context scholarship, including mine. But... respond? Not worth my time.
RLR

EXHIBIT 3

(persons whose email addresses were learned only by discovery are in bold)

----- Forwarded Message -----

From: Barry Jones <barryjoneswhat@yahoo.com>
To: "rhowe@ses.edu" <rhowe@ses.edu>
Cc: Gary Habermas <ghabermas@liberty.edu>; "taylor@westmont.edu" <taylor@westmont.edu>; Craig Blomberg <craig.blomberg@denverseminary.edu>; "dwallace@dts.edu" <dwallace@dts.edu>; "pixelator99@hotmail.com" <pixelator99@hotmail.com>; "jc4runner@gmail.com" <jc4runner@gmail.com>; "wrm12@att.net" <wrm12@att.net>; "anastasis_1999@yahoo.uk" <anastasis_1999@yahoo.uk>; "rlaurens@gmail.com" <rlaurens@gmail.com>; "agilaw@earthlink.net" <agilaw@earthlink.net>; "sethcooper.law@gmail.com" <sethcooper.law@gmail.com>; "jasonte@aol.com" <jasonte@aol.com>; "cluskin@discovery.org" <cluskin@discovery.org>; "samualchamberlain@live.com" <samualchamberlain@live.com>; Bass Justin <justinwbass@yahoo.com>; "coffeetable.philosophy@gmail.com" <coffeetable.philosophy@gmail.com>; "warrengfrench@yahoo.com" <warrengfrench@yahoo.com>; "amygarner85@yahoo.com" <amygarner85@yahoo.com>; "stevencarrwork@hotmail.com" <stevencarrwork@hotmail.com>; "dbarker@ffrf.org" <dbarker@ffrf.org>; Greg Rhodes <grhodes@ylclaw.com>; Faith Slayer . <ancientofdays23@gmail.com>; Roger Pearce <roger.pearce@gmail.com>; "carmstuff@yahoo.com" <carmstuff@yahoo.com>; Angie Dowell <angie@ylclaw.com>; "havalos@iastate.edu" <havalos@iastate.edu>; "presskit@reasonablefaith.org" <presskit@reasonablefaith.org>; "jge642000@yahoo.com" <jge642000@yahoo.com>; "carmdiane@yahoo.com" <carmdiane@yahoo.com>; "jeremwalker@yahoo.com" <jeremwalker@yahoo.com>; "ditc@hotmail.com" <ditc@hotmail.com>; "midwestapologetics@hotmail.com" <midwestapologetics@hotmail.com>; "peter_barber@hotmail.com" <peter_barber@hotmail.com>; "rwestb@jhu.edu" <rwestb@jhu.edu>; "tjl@jhu.edu" <tjl@jhu.edu>; "dustin.wendt@hotmail.com" <dustin.wendt@hotmail.com>; "truthbombapologetics@gmail.com" <truthbombapologetics@gmail.com>; "exchangeanswers@gmail.com" <exchangeanswers@gmail.com>; "info@josh.org" <info@josh.org>; "cynthia.curran8@email.com" <cynthia.curran8@email.com>
Sent: Wednesday, December 9, 2015 4:09 PM
Subject: Fw: Nahum out of the canon?

A copy of this message was sent to numerous associates of JP Holding, as well as to the Christian Research Institute.

Mr. Holding has now been *entirely* disowned by his favorite scholar *THREE* times.

The *first* time was when Context Group co-founder Richard Rohrbaugh, having reviewed a sample of Mr. Holding's insults toward me in a debate from 2008, and concluded that Holding gives Christianity a bad name, he needs serious help, that that neither Rohrbaugh, nor the Context Group nor any other scholar Rohrbaugh could think of would want anything to do with the behavior of Mr. Holding. Archived at <http://bcharchive.org/2/thearchives/showthreadc69e-2.html?t=253929>

The *second* time Rohrbaugh disowned Holding entirely was implicit: I had recently emailed Rohrbaugh, asking whether there might possibly be a good or divine reason why Nahum was so insulting and thus maybe it deserves its canonical status, contrary to Rohrbaugh's belief that the insulting style of Nahum is a reason to reject its canonicity. Mr. Rohrbaugh replied that the honor/shame and riposte/challenge dialectic of the biblical agrarian societies was not godly, and is NOT appropriate for modern Christians to employ.

The *third* time Mr. Rohrbaugh entirely disowned Mr. Holding could not have been couched in terms more glaringly negative: A few days ago I emailed Rohrbaugh with links to Holding's "The Christian and Harsh Language" article, therein I pointed out that Holding depends primarily on Rohrbaugh's *Social Science Commentaries* to support insulting/attacking those who publicly bait or criticize the Christian faith.

I included in this email some quotes of Holding's decidedly antiChrist and closet-homosexual language showing his known and disturbingly childish preoccupation with male penises, males urinating on themselves, likening his opponents to people who display their naked genitalia to others with shouted advertisement of such, etc., etc. It was important to me that Mr. Rohrbaugh not be presented merely with Holding's direct usage of Context Group scholarship, but that he should also see how Holding's understanding of said scholarship *affects the way he acts in actual life* (i.e., the 'fruits' of Holding's abuse of Context Group scholarship)

Mr. Rohrbaugh replied on December 8, 2015, specifying that Holding's tektonics.org website is an obvious perversion of both the NT and ALL of Context Group scholarship, including Rohrbaugh's own. If you think Holding is a responsible and honest researcher or scholar, try reconciling that with Rohrbaugh's view that tektonics.org is an obvious perversion of both NT and Context Group work. How that for an endorsement.

If you ever wanted to have a real kick-ass argument for why I think people who financially support Holding are equally as deceived or stupid as the idiots who financially support Benny Hinn, you just got it...square in the face.

However dumb you think I might be for rejecting Christian claims, I can sleep well at night knowing that I at least have not dedicated most of the last 20 years to obviously perverting the NT and sound scholarship. There are no atheist scholars who call any of my work an obvious perversion, the way Rohrbaugh characterizes Holding's work.

If Mr. Holding doesn't like being thrown off the top of the tallest skyscraper in the world by his current mortal enemy (like I just did herein), he should quit trying to rise so damn high.

"Let not many of you become teachers, my brethren, knowing that as such we will incur a stricter judgment." (Jam 3:1 NAU)

The only that could be worse than a Christian being disowned by his favorite scholars for perverting the NT and Context Group scholarship, is a Christian ***who has a masters degree in library science and more than 20 years of relentless bible study and many bible articles citing the Context Group for support***, being disowned by his favorite scholars for perverting the NT and Context Group scholarship.

What can we learn from a high-strung loudmouth who never realized, for the last 20 years, that the scholars he thinks support him the most, think he perverts the NT? Missing the

forest for the trees for that long of a period probably doesn't look good on a resume, does it?

Are you starting to wonder whether or not Holding's "missing the forest for the trees" disease might also have affected his comments and research on ME in that "internet predator alert" article on me that his lawyer told him to remove?

Or do you prioritize your current comfort zone over honest objectivity? If you think Mormons and cultists have a duty to the truth to depart from what's comforting in their life when they have discovered they missed the truth, how does it feel to be presented with that disturbing option yourself? Will you be an example to cultists and leave what you found comfortable for the sake of the truth? Or will you stick what what's comfortable and thus bear fruit that when called upon to show how much Jesus has changed you into a light to the world, you are virtually indistinguishable from unbelievers?

=====
=====

----- Forwarded Message -----

From: Richard Rohrbaugh <rbaugh@lclark.edu>
To: Barry Jones <barryjoneswhat@yahoo.com>
Sent: Tuesday, December 8, 2015 6:43 PM
Subject: Re: Nahum out of the canon?

I glanced at the stuff on the website. It is obviously a perversion of both the NT and ALL Context scholarship, including mine. But... respond? Not worth my time.

RLR

On 12/7/2015 6:28 PM, Barry Jones wrote:
Mr. Rohrbaugh,

Thanks for your response. I believe that your work on the social world of the bible is sorely needed in light of the "read the bible like a newspaper" stuff we get from most American commentaries and churches. I was surprised very much to hear how Funk from the Jesus Seminar screamed at you because of your insisting that they consider the social context of the gospels before deciding which sayings go back to Jesus himself. That just made me dizzy that such a qualified person could so staunchly resist the very relevant context issues.

I have some other questions, no rush:

24 The Lord's bond-servant must not be quarrelsome, but be kind to all, able to teach, patient when wronged,

25 with gentleness correcting those who are in opposition, if perhaps God may grant them repentance leading to the knowledge of the truth,

26 and they may come to their senses and escape from the snare of the devil, having been held captive by him to do his will. (2Ti 2:24-1 NAU)

Does the the "gentle" in 2nd Timothy 2:24 *include* any type of insult or "shaming"? Or does 'gentle' there mean what we modern Gentiles think it means (in context...teaching in a patient way that does not involve insults or shaming *even when instructing those who publicly criticize the faith*)?

You might be interested to know that your Social Science Commentary is being used by an evangelical apologist, who makes money selling books and promoting himself as an apologist, to establish that there is biblical justification for modern-day Christians to publicly shame/attack/insult those who publicly criticize Christian faith.

For example, in the article where he acknowledges using your work as a guide, he gives the following advice to Christians who are interacting with different types of people:

Private/questioner -- teach them.

Private/baiter -- avoid them.

Public/questioner -- teach them.

Public/baiter -- attack them.

This is in line with the much broader dichotomy between public and private discourse and encounter in the social world of the Bible.

Source: <http://www.tektonics.org/lp/madmad.php>

Is there anything *at all* in any of your published writings, or the published writings of the other Context Group authors, that would support the above-quoted **Public/baiter -- attack them** conclusion? Of course he doesn't mean *physically* attack, he only means "shame/insult/rebuke", etc.

You might be even more interested in how says that people who refuse to use riposte in modern American culture are sick and aiding and abetting that sickness:

""But we should be all things to all men and modify our approach for today's culture."

Then it's time to give up blood atonement too. No, modern culture has forbidden riposte as a way to prevent deserved criticism and to silence the critic. To that extent, the culture itself is sick and those who reject valid riposte are themselves aiding and abetting the sickness." (Ibid)

Is he misrepresenting your work there?

You might be wondering what kind of person this "apologist" is. Here is a sample from his early work showing him responding to various people who disagree with his views, and to the best of my knowledge, he refuses to acknowledge that this was unChristlike:

"And you? You're nothing but a sanctimonious ant with delusions of your own grandeur; you're nothing but a modern day Hugh waving your swollen member around and knocking people over with it or else disgusting everyone by pointing to it and shouting to everyone to look at it." ----<http://www.ctm.org/forum/index.php?showtopic=84>

-----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such language. <https://web.archive.org/web/20050501231546/http://www.ctm.org/forum/index.php?showtopic=84>

"In your arrogance you missed it; you were so busy waving your giant pee-pee around that you bonked yourself on the head with it and didn't even notice." -----

""<http://www.ctm.org/forum/index.php?showtopic=89>

-----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such

language. <https://web.archive.org/web/20050501231540/http://www.ctm.org/forum/index.php?showtopic=89>

Swollen member? Giant pee-pee? Shouting at everybody to look at one's uncovered genitalia?

The trouble with this guy is not that he is just "wrong", but that he manages to convince other apparently weak-minded people that he is a giant in the field of bible scholarship despite lacking any formal education in bible related matters. He has a tax-exempt ministry and sells books about the world of the bible and "how to reconcile alleged bible contradictions". I therefore do not think that simply ignoring him fulfills the Christian duty to positively identify false teachers and advertise a refutation of their teachings that mar the image of Christ.

Having your work abused by others is probably something that deserves your attention and commentary, even if only to make sure that he doesn't mislead others regarding Context Group work.

Thanks again for your time, and I hope to find more of your lectures on the internet!

Barry Jones

From: Richard Rohrbaugh <rbaugh@lclark.edu>
To: Barry Jones <barryjoneswhat@yahoo.com>
Sent: Sunday, December 6, 2015 6:39 PM
Subject: Re: Nahum out of the canon?

Barry,

A lot of questions... Some quick answers:

If a biblical author approves of insulting language and attitude does that mean it is a good thing? No. It means that author was mean and insulting. Period. Are such comments "from God"? No. The Bible is a human product. It is not God's words, it is the words of its many authors. They were like us: some were wise and thoughtful, some were vindictive, blind and short sighted. The ancient Hebrews left us all sorts of stuff which THEY found meaningful. Some of it has proven so to people everywhere for over 2000 years. Other stuff they left us is less than worthwhile. There are lots of bad characters in biblical stories. Why should we imitate them?

Does God share the honor-shame outlook? No. But God does not share our outlook either. The honor-shame outlook is NOT Jewish. It was universal in the ancient world and still exists in much of the third world yet today. We can find it in ancient Babylon, Egypt, Greece, Rome, Israel etc. It happens to be the cultural world in which the biblical writers lived and wrote, so why should we be surprised that they wrote with the language and outlook of the time in which they lived? Is it appropriate for us? No. We are not an honor shame society now (early America was) and never will be again. No industrialized society on earth has ever been. Only agrarian societies are honor-shame.

How do we get the "Jewishness" out of the Bible. You can't because it is THEIR story. Moreover trying to do so sounds very like anti-semitism. How do we have a God unadorned by cultural garb? We can't. We are finite humans. We all have all the limitations of our own time and place. We see somethings well and others poorly. That is simply the human condition. There is NO POSSIBILITY of culturally unadorned thought on religion or ANY OTHER subject on the planet. So we Americanize Christianity. Germans germanize it. Africans africanize it. There is no such thing as culture-free Christianity and never will be. Naming ANY finite human version of Christianity to be culture-free is

idolatry pure and simple. It would make some version of us and our way of thinking the infinite, but human beings do not have the capacity to be divine. Paul got it right: "we see in a mirror dimly."

Richard

On 12/6/2015 4:27 PM, Barry Jones wrote:
Mr. Rohrbaugh,

I hope you are not too busy to answer email!

I saw your video on bible canon and was intrigued by your view that Nahum should be excluded from the canon due, in part, to its insulting presentation.

If an insulting demeanor is something the bible author approves of, doesn't that mean it is a good thing?

How can we determine which insulting comments in the bible are really from God, and which aren't?

For example, what reason do you assign for the biblical world being one of challenge and riposte? Is that because God is really like that? If not, what can we do to sift the "Jewishness" out of the bible so that we are left with how God really is, unadorned by cultural garb?

I've battled KJV Onlyists who insult everybody like crazy, and insist that this honor/shame dialectic is also appropriate for use in modern-day America. I don't think that makes sense, but what is your view?

My personal opinion is that when Christians today constantly insult those who are outside the faith, they aren't doing it because it is "biblical", they are doing it solely because they have a sinful lust to argue, nothing more, but perhaps I'm not caught up on the study of biblical morality?

Thanks,

Barry Jones.

EXHIBIT 4

Initial post: Dec 13, 2015 5:12:53 PM PST
skepticdude says:

Mr. Nick Peters, my name is Christian Doscher, the guy who is suing your savior James Patrick Holding.

Holding's lawyer just disclosed to me all those private emails and Tweb messages you exchanged with Holding and others. Holding told you to tell Habermas that I was a cyberstalker. Then you did exactly that. That's libel per se. I'm not a cyberstalker. That's a lawsuit against you personally. Please confirm that you and your wife Allie live at [REDACTED] 37721-2812, the process server needs your correct address. Have a nice day.

EXHIBIT 5

From: "Barry Jones" <barryjoneswhat@yahoo.com>
Date: Sun, Dec 13, 2015 at 5:47 PM -0800
Subject: Holding lawsuit, and Holding's lies
To: "Gary Habermas" <ghabermas@liberty.edu>
Cc: "pixelator99@hotmail.com" <pixelator99@hotmail.com>, "John Loftus" <loftusjohnw@gmail.com>

Mr. Habermas,

Mr. Holding's lawyer just disclosed a whole slew of private emails between you and Holding, among others, and you replied to him a few times on these matters.

That means you are a witness to these things. I cannot compel you into [REDACTED] state for trial, but I can certainly subpoena your answers to written interrogatories, and I'll be making sure to ask plenty, while making sure they survive any "objection" the Liberty lawyers might wish to protect you with.

It was Nick Peters, apparently, who directly informed you that I was a cyberstalker. That is not true, but it charges me with a crime I did not commit, so I'll be suing Mr. Peters too, and I know he lives at [REDACTED] 37721-2812

=====

Mr. Sparks,

Now that I have correctly identified you, it might behoove you to seek the advice of a more mature Christian on how to act when your faith is actually tested, since you seem to think walking in Christ involves little more than buying debate forums and talking yourself into a lawsuit. You know perfectly well I won't give up pursuing you and the other Tweb goons until I have run out of legal justification to do so. You mess with the wrong victim, you get hauled around by a legal hook in your nose until the victim decides to extend you some mercy.

You can play "let's bang heads" with me all you please, but your 14 years as a Senior Litigation Examiner didn't do much more for Holding than cause him to file 3 frivolous motions to dismiss, all of which were yanked by his lawyer soon after he came on board. Clint Eastwood said it well, a man's got to know his limitations. Experience says you will surely also fail as big as Holding did if you try to take me on without a lawyer. And Holding screwed up so bad that his

lawyer was required to divulge to me reams of your private emails to Holding and everybody else. Now I have about seven lawsuits planned against you, "separate" because of the "single publication rule".

Are you still in the mood to find out where I live so you can pay me a visit, like you said on Tweb some months ago? Let's find out just how far in the toilet you can wedge yourself before you start bleeting like the piece of shit you are:

Christian Behrend Doscher

Social Security Number: [REDACTED]

Date of Birth: July 23, 1970
[REDACTED]

If you ever show up at my doorstep, you better have a gun, because you clearly intimidated some type of violence with your ill-advised posturing at Tweb, when you said:

Do you have an address for him? I might be down in his area this weekend.

PM me

Source, skepticbud thread at Tweb, 07-02-2015, 06:40 PM, Post #56

Yeah, trying explaining *that* dogshit to your friends. What, were you gonna sell me some Amway products?

Think I'm 'stalking' you now? Report it to the police, and I'll add that to the lawsuit too, you stupid prick.

Wanna know my purpose? I'll tell you what its not: It isn't buttering you up to be in the mood to settle. I desire full litigation and jury trial, no settlement. You'll be dealing with me, or paying a lawyer to do so, for the next year at the least.

I don't play, so FUCK YOU, and get ready to rumble. Posting lies about my private life all over the internet, and helping others do so, and other torts, are actions for which a jury will decide your financial fate. You ain't laughing now, scumbag.

EXHIBIT 6

----- Forwarded message -----

From: "**Barry Jones**" <barryjoneswhat@yahoo.com>

Date: Sun, Dec 13, 2015 at 6:51 PM -0800

Subject: Fw: Nahum out of the canon?

To: "info@namb.net" <info@namb.net>

Cc: "pixelator99@hotmail.com" <pixelator99@hotmail.com>, "John Loftus"

<loftusjohnw@gmail.com>, "Gary Habermas" <ghabermas@liberty.edu>, "Craig Blomberg"

<craig.blomberg@denverseminary.edu>, "dwallace@dts.edu" <dwallace@dts.edu>

I notice that you list James Patrick Holding as a certified apologetics instructor. <http://www.4truth.net/fourtruthcb.aspx?id=8589953074>

I just wanted you to know two things:

- 1 - among the biblical criteria for teachers, the bible prioritizes the moral walk over the academic knowledge.
- 2 - I am currently suing James Patrick Holding in civil court, because he maliciously, and with the help of his idiot friends at theologyweb.com, viciously defamed and libeled me, which is a blow to his character and makes him unfit for teaching.

My name is Christian Doscher, plaintiff in the matter of Doscher v. Holding, Case No. 15-2-01352-9, [REDACTED]

I notice that in your Certified Apologetics Instructor Program description, you say:
Finally, the candidate must provide 3 reference letters from others in ministry positions who testify that the person has a strong Christ-like character and an effective ministry.
<http://www.4truth.net/fourtruthcb.aspx?id=8589953074>

I don't know what reference letters you got in Mr. Holding's case, but there is plenty about this fool you should know before you continue endorsing him.

You might wish to have a private discussion with Mr. Holding and remind him that failure in the moral arena biblically disqualifies him from the teaching ministry (James 3:1, he *should* be judged more severely), regardless of how consistently he posts his reviews of books. His spreading of lies about me on the internet and to other scholars such as Gary Habermas indicate that Holding is less like a mature seasoned Christian ripe for ministry and more like an ADHD toddler with a loaded shotgun.

You may wish to have him explain why he took down his "internet predator alert" on me, *if he continued to seriously believe it was legally defensible*. His taking down that set of vicious lies and half truths proves that somebody, likely his lawyer, convinced him it could not be defended legally.

Then you might ask him to explain how his lawyer could have turned over to me all those private emails between Holding and others, if that lawyer agreed with Holding that this lawsuit was frivolous. No lawyer will subject their client to answering highly personal invasive discovery questions if they believe they can successfully argue that the lawsuit lacks merit and should be dismissed.

Take care as you listen to Holding's excuses, he contradicts himself by insisting that my lawsuit against him is frivolous, but then acknowledging that he cannot get rid of the case just yet. He has made no attempt whatsoever to get the case dismissed on the merits, the most he did was file a motion to dismiss for lack of personal jurisdiction (i filed in [REDACTED] he lives in Florida), and the first thing done by the lawyer Holding retained, was strike that motion to dismiss.

Yeah, something is seriously wrong with the morals of certified apologetics instructor James Patrick Holding, and you cannot just continue endorsing him with all these allegation of his immorality flying around. I will gladly send you the lawsuit materials if you wish to see them, and I stand by my accusations of him 100%, and will be demonstrating their truth to a jury.

I would ask that you initiate the Matthew 18 process against him due to his spreading of half-truths and misrepresentations of me, and if he doesn't repent, you are under obligation to view him thereafter the way first-century Jews viewed heathens and publicans Matthew 18:17. The pre-Cross teachings of Jesus still apply to future Gentile disciples, Matthew 28:20.

I am an atheist, but that hardly justifies a Christian in spreading lies about me. His choice to take down his Internet Predator Alert would be your first clue that he now recognizes that particular moral failure.

What follows is proof, from his own favorite scholar, that Holding has been perverting the New Testament and ALL of Context Group scholarship for the last 20 years. Do you endorse apologetics teachers who continually miss the forest for the trees? Yeah, Holding has a lot of materials, but that's like saying Benny Hinn preached a lot of sermons. Quantity doesn't demonstrate quality, does it?

Christian Doscher

(REPOST OF GROUP EMAIL IN PREVIOUS EXHIBIT)

EXHIBIT 7

From: "Barry Jones" <barryjoneswhat@yahoo.com>

Date: Fri, Dec 11, 2015 at 3:01 PM -0800

Subject: Now I know where the Tweb John Sparks works and lives

To: "pixelator99@hotmail.com" <pixelator99@hotmail.com>, "Gary Habermas" <ghabermas@liberty.edu>, "Greg Rhodes" <grhodes@vlclaw.com>, "John Loftus" <loftusjohnw@gmail.com>

For the record,

Google cache for the theologyweb.com "whois" gives the name "John Sparks" who gave the 400 Market Street address in Louisville KY as his work address. So Sparks' attempt to hide that stuff under privacyprotector was a big waste of money.

Google also gave

John Sparks
Senior Litigation Examiner
at The Underwriters Group
Louisville, Kentucky Area

The address of which is 1700 EASTPOINT PKWY, LOUISVILLE,KY 40223

Which is perfectly consistent with Sparks' claim on the now-hidden skepticbud thread at Tweb that he is a paralegal.

Since I've correctly identified the John Sparks of Tweb who libeled me, and I know where he works, I can now successfully have him served with summons and complaint at his place of work. I don't care if he no longer works there either. I can simply show I tried serving him at his last known addresses, it didn't work, and then motion the court for service by certified mail or publication. Don't stupidly pretend you'll stay out of court, Sparks. You keep hiding and I'll be sending a default judgment to your local sheriff, and you'll be making your local Uhaul very happy.

How does it feel when somebody else goes hunting on the internet for your personal contact information? What goes around, comes around.

And for what its worth, I apologized to the elderly John Sparks who wrote books on Kentucky history, as well as to the Janine Sprague, for having concluded they were the same as the Sparks of Tweb and the Christianbookworm of Tweb. Don't make fun of me for that mistake unless you are positively certain YOU didn't make a mistake in identifying me with Richard Wozinya and all the other names I've consistently denied being. Holding's paranoia could not be made clearer than his choice to file a police report on me falsely claiming I spammed him. If Holding had a single ounce of integrity, he would have worked with me to try and ferret out exactly who Wozinya is, instead of blindly assuming we are the same just because he is also an atheist who likes bible debates and thrash metal and any number of other affinities that any two people could possibly have by sheer coincidence.

here is a copy of the message I sent to Spark's work "Underwriters":

=====

Please forward to Senior Litigation Examiner "John Sparks"

My name is Christian Doscher, the person who is currently suing your friend Sheila Rangslinger. I'm sure you know who she is. She loved the internet predator alert she posted about me, and would never have taken it down unless her lawyer forced her to under threat of recusing from her defense. Actually Sheila is a very conflicted man named James Patrick Holding, whose filthy mouth is all over the internet, see <http://the-anointed-one.com/quotes.htm>

See his sick "explanation" for such language at <http://www.theskepticalreview.com/bobbyjerryskids.html>

You are the "sparko" who posts all that defamatory stuff about me over at theologyweb.com. You removed that forum from public access. Good move, but not quite enough. And Holding's lawyer just disclosed to me in discovery many private emails/Tweb messages between you and Holding and others where you each defame me more and more.

I got a good laugh out of your messages where you start backing off and pretending you were just "opining" about me. Save your breath, you can tell it to the jury.

I've sent a copy of this to your pixelator99@hotmail.com address.

Please email a response indicating which of the below addresses and phone numbers correctly represent your most current contact information. I'll need those so I can properly direct the process server.

If you do not respond, I'll be forced to have you served summon and complaint at Underwriters.

Thank you for your attention,

Christian Doscher
=====

Address 1:
3704 Parkview WAY
Jeffersonville, IN 47130
(502) 636-2790

Address 2:
2135 Wrocklage AVE
Louisville, KY 40205
(502) 459-5628

Address 3:
2015 Fort ST

Louisville, KY 40217
(502) 636-2790

Address 4:
2045 Alta AVE
Louisville, KY 40205
(502) 636-2790

Address 5:
623 Merwin AVE
Louisville, KY 40217
(502) 459-5628

Address 6:
1907 Deer Park AVE
Louisville, KY 40205
(502) 456-1617

Address 7:
904 Lydia ST
Louisville, KY 40217
(502) 636-2790

Address 8:
902 Wildwood LN
New Albany, IN 47150
(517) 351-6677

Address 9:
3300 Great American Tower 301 East Fourth ST
Cincinnati, OH 45202

Address 10:
1425 Quincy ST
Louisville, KY 40206
(502) 585-2664

EXHIBIT 8

From: Barry Jones <barryjoneswhat@yahoo.com>
Sent: Monday, December 14, 2015 6:16 PM
Subject: Re: Holding lawsuit, and Holding's lies
To: Habermas, Gary <ghabermas@liberty.edu>
Cc: <dwallace@dts.edu>, <taylor@westmont.edu>, John Loftus <loftusjohnw@gmail.com>, Craig Blomberg <craig.blomberg@denverseminary.edu>, <pixelator99@hotmail.com>, <mwfergus@uci.edu>

Mr. Habermas,

I was talking about sending you interrogatories because your private discussions with Holding indicate that you chose to believe his lies about me, and that's important to my lawsuit. I have no grounds to sue you, as should be obvious anyway, so when Holding tells you to consider I just might do that, he is lying again. You are a material witness to matters in my lawsuit because you endorse Holding and appear to accept his lies about me without doing your own independent research of me. That doesn't make me wish to sue you, it just makes me want to get your testimony to these things under oath.

If the bible says a teacher's morals are just as important or more important than his knowledge, then I would have expected you'd have made a bit more of an inquiry into his morality before you endorsed his book, instead of just praising how strong his arguments are.

I'll bet you \$50...had you known about Holding's pornographic filthy insults and consistently unbiblical demeanor when dealing with those outside the church...had you known that his own favorite scholar Richard Rohrbaugh says Holding gives Christianity a bad name, and perverts not only the NT with his insulting demeanor, but perverts all Context Group work, including Rohrbaugh's own...had you known that theologyweb was specifically designed to facilitate the very type of ceaseless wrangling of words so strongly condemned in Titus 3:9-11...had you known about Holding's belief that the "gentle" in 2nd Timothy 2:24-26 includes the need to talk down to one's opponents in a pornographic filthy way

....you probably wouldn't have written quite as glowing of a forward to Holding's ridiculous "Defending the Resurrection", and Blomberg would have, had he known better, similarly declined to endorse him on other subjects.

If you admit you knew all this stuff before you endorsed him, you are more guilty since you know perfectly well one's morality is far more important a qualification for Christian teachers, than simple academic knowledge.

If you admit you did not know all this stuff before you endorsed Holding, that's ok, nobody's perfect, and it would help the cause of truth for you to admit such instead of trying to smooth things over and avoid creating any ripples.

If you admit that you would have written that favorable forward to Holding's book *even had you known about his pornographic insults and his defaming other people, and his obvious inability to bridle his tongue*, well, then you appear to be uneducated about the biblical criteria for those who wish to be teachers. James 3:1 is a pretty good start if you have any illusions that a lower standard applies to teachers.

For the last 20 years, Holding has used Context Group scholarship to justify his employing vitriol and filthy insulting language to "shame" those who criticize Christianity.

Richard Rohrbaugh, co-founder of the Context Group, has stated that Holding gives Christianity a bad name, they want nothing to do with his behavior, and he recently specified that Holding's use of Context Group work to justify his pornographic, filthy and insulting demeanor, is a perversion of the NT and ALL Context Group work, including Rohrbaugh's own....

....and the most you can do is sit on the sidelines and ask Holding what he thinks about continuing to use "strong comebacks"?

So what's it gonna be? I would like to be able to tell the world on my website that when you found out Holding was morally disqualified from ministry for failure to bridle his tongue and for being denounced THREE times by his own favorite scholar for perverting Context Group teachings and the NT to support his filthy defamatory demeanor, you initiated and completed the Matthew 18 process of moving inevitably toward repentance/disassociation.

You have no options here.

- You do NOT have the option of arguing that filthy pornographic talk is allowed to any Christians in any context today, nobody supports it except Holding, and everybody, excluding the stupid goons at Tweb, is against it.
- You do not have the option of saying maybe Rohrbaugh doesn't realize how much his own scholarship supports conclusions he violently disagrees with. That's about as stupid as saying your own scholarship on the historicity of the resurrection of Jesus lead to conclusions about it that *you* violently disagree with.
- You don't have the option of saying you endorsed Holding's work despite knowing about his sordid history, since that would make you look even worse. What, you didn't know that the New Testament condemns filthy talk and returning insult-for-insult?
- You cannot argue that Matthew 18 is limited to local pastoral authority, you know perfectly well that Mr. Holding views his own local pastor, if any, as a kind gentle know-nothing and Holding would first argue that pastoral criticism of him is wrong, instead of simply submitting to a criticism from a spiritually higher authority. So you know perfectly well local pastoral authority doesn't mean BEANS to Holding, and something else must be done to curtail Holding from influencing others to imitate his unbiblical ways.
- You cannot argue Matthew 18 doesn't apply today, the resurrected Jesus said ALL his pre-Cross teachings applied to future Gentile followers, Matthew 28:20.

There is every biblical justification for you to start the Matthew 18 process, and from your private emails with Holding, I can tell that you've done not much more than ask a few questions without the slightest concern that some type of discipline or dissociation need be imposed. You talk to Holding about his problems the way old men talk about that big catfish they caught back in 1962. Sir, matters are just a tad more serious, wouldn't you say?

I do not want to have to tell the world that that you endorsed him despite his sick filthy demeanor, and I don't want to tell the world that after you were informed about his criminally libelous actions that landed him in a lawsuit, you didn't do much more than simply sit on the sidelines and ask a few questions about whether he plans to continue using strong language in the future. I want to tell the world that Habermas was put in a position where he could have attempted to keep a lid on things so he wouldn't have to admit error and accuse a brother of disqualification from ministry, but he didn't, and he bravely did what the bible requires despite the waves this might create in the world of popular apologetics.

Either admit you did wrong and initiate the Matthew 18 process, or start agreeing with Holding that supporting biblical arguments with filthy pornographic talk, and defaming other people, and being denounced by one's own favorite scholars for having missed the forest for the trees for more than 20 years, and absolute inability to bridle one's tongue, are biblically justified options from which Christian teachers may choose. Otherwise, I'd say you've got your work cut out for you.

I really respect you despite my being an atheist and disagreeing with your view on the resurrection of Jesus. But if God exists, he is probably satisfied with your work on apologetics, and now likely wants you to start getting some practice in the admittedly difficult field of "let him be unto thee a heathen and a publican!" Matthew 18:17.

It's easy as pie to "defend the resurrection". Lots of data, lots of gossip. Discussions that never end.

But walking away from a sinning brother seeking a teaching ministry *because his immoralities outweigh whatever bible knowledge he had*, **that** is the far more difficult challenge to master. Right?

You have no need to worry I will sue you. I won't because i have no grounds for doing so. You are morally upright as far as I can tell. It's just that I think you've fallen victim to the popular fallacy of refusing to do what needs doing because you are "invested" to a certain extent in Holding. WWJD? Answer: Matthew 18:17.

And if you think his consistent lying and abuse of scholarship is no problem, maybe you'll think his closet homosexuality, proven by his rather consistent references to penis size, his being a mommy to some guy and spanking them, his remarks about how he caused some guy's butt to hurt, etc, etc., might awaken you to the fact that evangelical Christians aren't always honest about sins that are plaguing them, and yet they are known by their

fruits. When Holding tells you he's not a homosexual, that's about as convincing as Benny Hinn saying he is not a con artist. GIVE ME A BREAK.

Don't believe me? It's not just us spiritually dead atheists who notice this, apologist Steve Hays noticed Holding's compulsive anal-fixation and calls him on it just as much as I do: <http://triablogue.blogspot.com/2005/05/tektonic-faultlines-1.html>

If you wouldn't expect an orange tree to produce apples, you might want to ask Holding whether his choice to use unnecessarily sexual and homophobic counts as the "fruit" that others are allowed under bible principles to say is being produced by his nature.

If you think his denial of being a homosexual counts against this, remember Ted Haggert. Nobody in his church suspected anything wrong until the godless secular media exposed his homosexuality.

Mr. Habermas, people have a funny way of being incapable of seeing the truth (viz. Rohrbaugh proving Holding has been perverting Context Group scholarship for more than 20 years), and I suggest that "you shall know them by their fruits" is a far more objective way to learn the truth about them, than blindly accepting whatever self-serving testimony they might give. If you want to know what Benny Hinn is really like, you don't ask him. You watch him in action. Same with everybody...including Holding. If Holding could pervert Context Group scholarship for 20 years, that might explain why doesn't recognize how Romans 1:26-27 condemns his ministry to the full.

Thank you,

Christian Doscher

EXHIBIT 9

----- Forwarded message -----

From: "Barry Jones" <barryjoneswhat@yahoo.com>

Date: Mon, Dec 14, 2015 at 6:29 PM -0800

Subject: your certified apologetics instructor is gay and doesn't care about the bible's divine inspiration

To: "info@namb.net" <info@namb.net>

Cc: "pastor.joel@fbsweetwater.org" <pastor.joel@fbsweetwater.org>,

"dawn.fox@fbsweetwater.org" <dawn.fox@fbsweetwater.org>, "John Loftus"

<loftusjohnw@gmail.com>, "dwallace@dts.edu" <dwallace@dts.edu>, "taylor@westmont.edu"

<taylor@westmont.edu>, "Gary Habermas" <ghabermas@liberty.edu>, "Craig Blomberg"

<craig.blomberg@denverseminary.edu>, "pixelator99@hotmail.com"

<pixelator99@hotmail.com>, [REDACTED], "mwfergus@uci.edu"
<mwfergus@uci.edu>, "justinwbass@yahoo.com" <justinwbass@yahoo.com>

This is primarily addressed to North American Missions Board because they are conservative and yet endorse James Patrick Holding as a teacher despite his filthy talk, his not caring about the bible being the inspired word of God, and his homosexuality, the latter of which is also attested to by Christian apologists and not just unbelievers.

For those who were cc'd and don't know what's going on, my name is Christian Doscher. Internet apologist "James Patrick Holding", who lives in Ocoee Florida and has previously claimed to attend a Sweetwater Baptist Church near his home, has in the last few months libeled and defamed me like crazy at theologyweb.com, at his website tektonics.org with an article entitled "internet predator alert" (which his lawyer forced him, probably at gunpoint, to take down), and in numerous private emails to his friends and other bible scholars. I was given access to those private emails by operation of law given my pending civil lawsuit against Holding. Holding's out-of-control demeanor extends to filing false police reports against me accusing me of spamming his email with porn, when in fact the police report indicates he doesn't even have circumstantial evidence (and I'm innocent of the charge anyway, the detective refused my offer to send my under-oath statement).

Holding's email address is jphold@att.net, and I have no desire to communicate with him or have any third party send him any message, I just give that out for your personal convenience. I can only communicate with him through his lawyer.

I have severe problems with the fact that Mr. Holding enjoys the support of many conservative Christian people and groups despite his not caring whether the bible is the inspired word of God or not, his homosexuality and being accused by his own most-quoted and favorite scholar of perverting the scholar's work for the last 20 years, and despite his filthy pornographic insulting style that you good people probably honestly did not know existed until a spiritually dead atheist brought it to your attention today (sort of like nobody suspected Ted Haggert was a homosexual thus unqualified to be a teacher, until the godless secular media exposed him).

As you read my documentation of this silly fool's true fruit below (ye shall know them by their fruits), please keep in mind that the changing of culture does not render change in God. Teachers are still judged by a higher standard of morality regardless, James 3:1.

I added the other email addresses as cc, not bcc, to enable you all to be able to email each other on how important it is to start the Matthew 18 process of moving Mr. Holding toward one of two inevitable outcomes: repentance, or dissociation. The "[REDACTED]" is Mr. Holding's attorney who is representing him in my currently pending defamation lawsuit against Holding. That ought to tell you how confident I am that my accusations against Holding herein are true.

the "pixelator99" email is John Sparks, or the "sparko" who co-owns theologyweb.com. He is a paralegal in Louisville Kentucky, and personal friend of Mr. Holding. He helped Mr. Holding defame me, and I wrote him an email a while back letting him know that he will be receiving a

summons and lawsuit complaint from a process server in short order...thus insuring that attorney [REDACTED] makes even more money in billable hours defending these dogs.

This is in reference to James Patrick Holding, whom you (Southern Baptist North American Mission Board) endorse as a certified apologetics instructor at <http://www.4truth.net/fourtruthcb.aspx?id=8589953074>

When I debated Holding at theologyweb some years ago, I remarked that he had earlier commented that he didn't care whether the bible is the inspired word of God or not. Holding replied and specified that he wasn't being sarcastic when he made that comment:

-----me: I just found out that you made a statement several years ago that you personally don't care if the bible is the inspired word of God or not, so that your gargantuan efforts to "defend biblical inerrancy" were all in the name of finding a way to beat up other people and had nothing to do with your personal convictions whatsoever. Better break out that "I-was-just-being-saracastic" excuse again, you're gonna need it to back out of that blooper.

-----Holding: I wasn't being sarcastic. Each of the 20 times I have said something like that, it was genuine. Which one did you have in mind?

If you wish to check the context to make sure I'm not quoting him out of context, thank God for wayback machine, and its ability to overcome theologyweb's attempt to get rid of this credibility impeaching evidence

<https://web.archive.org/web/20130820194740/http://www.theologyweb.com/campus/showthread.php?118797-Spitball-s-James-vs-Paul-Wah-Wah-Don-t-Hit-Me-Thread>

Lest you think only atheists accuse Mr. Holding of being homosexual, you'll be interested to know that Christian apologist Steve Hays of Triablogue grew weary of Holding's anal fixation and constant references to male buttocks. From <http://triablogue.blogspot.com/2005/05/tektonic-faultlines-1.html>

"As a flavor of the level at which Holding's mind operates, his latest thread is charmingly headed: **"Steve Hays needs to stop passing gas at his betters."** This is a specimen of Holding's recurrent obsessive-compulsive anal fixation"

...**"This is not the first time that Holding has taken a personal interest in my backside. Holding would be well advised to resist his unsavory attraction so many homoerotic illustrations."**

Mr. Holding has a rather sordid history of illustrating his argument victories with analogies to somebody's penis-size, how they hit themselves in the head with their genitals, how they compel others to view their groin with shouted advertisements, etc. From <http://the-anointed-one.com/quotes.htm>

"And you? You're nothing but a sanctimonious ant with delusions of your own grandeur; you're nothing but a modern day Hugh waving your swollen member around and knocking people over with it or else disgusting everyone by pointing to it and shouting to everyone to look at it."

-----that's not "out of context", Mr. Holding was filthy and unbiblical throughout the whole rant. Here's the entire thing, archived courtesy of

wayback: <https://web.archive.org/web/20050501231546/http://www.ctm.org/forum/index.php?s=howtopic=84>

"In your arrogance you missed it; you were so busy waving your giant pee-pee around that you bonked yourself on the head with it and didn't even notice."

-----See full context, courtesy of

wayback: <https://web.archive.org/web/20050501231540/http://www.ctm.org/forum/index.php?s=howtopic=89>

Holding has inundated atheists with "bathroom humor", from <http://www.theskepticalreview.com/jftbobbyrestroomvisits.html>

So there too, nanny nanny boo boo, stick your head in doo doo. In short, you have no answer, so you instead switcheroo to this non-answer [sic] of non-details [sic], which is a signal that you are aware of your defeat and have only pride to salvage. Suit yourself, but you look funny standing in a pile of doo doo (TheologyWeb, post #103).

My dog made a better agrument [sic] in the yard this morning! I'll skip all the repeated doggy doo... ("Decontextualized Quotes").

Priapus continues to spin his wheels with the same stale arguments, responded to and never answered in turn; and he continues to wave his giant pee-pee around ("Bumbling Twits Ministries").

Mr. Holding demonstrates how unfit for ministry he is, by attempting to justify his filthy violent talk, such as his argument that such "black humor" can be appropriate for Christians in certain circumstances:

<http://www.theskepticalreview.com/bobbyjerryskids.html>

I notice that in your Certified Apologetics Instructor Program description, you say:
Finally, the candidate must provide 3 reference letters from others in ministry positions who testify that the person has a strong Christ-like character and an effective ministry.

<http://www.4truth.net/fourtruthcb.aspx?id=8589953074>

I don't suppose any of the three references Holding gave you, truthfully admitted his homosexuality, or his sexually inappropriate metaphors used to describe his opponents? Would we be having this conversation if his 3 references had been that comprehensive? Of course not.

If you wouldn't expect an orange tree to produce apples, you might want to ask Holding whether his choice to use unnecessarily sexual and homophobic language counts as the "fruit" that others are allowed under bible principles to say is being produced by his nature.

If you think his denial of being a homosexual counts against this, remember Ted Haggert. Nobody in his church suspected anything wrong until the godless secular media exposed his homosexuality. So his denials of being homosexual counted for exactly nothing, unless you count deception.

If Ted Haggert can rise to the position he had in evangelical conservatism without anybody discerning he was egregiously unfit for ministry, so can anybody, including Mr. Holding. James 3:1 counsels that teachers are judged by a higher standard, you cannot just chalk this up to previous sins he's now forgiven for, it is a serious recurring problem, as evidenced by the fact that he still refuses to admit all that filthy language was condemned in the bible. He STILL doesn't see the light! How's that for a leader?

When I personally debated Holding at that place that was specifically designed to subvert Titus 3:9-11 and facilitate ceaseless wrangling of words (theologyweb.com, which Holding called his "exclusive" place for debate), he called me names so much that I sent a sample of these to his favorite Context Group Scholar Richard Rohrbaugh for commentary. Rohrbaugh replied that Holding gives Christianity a bad name, the Context Group wants nothing to do with his antics, and that he needs serious help. Conveniently, that theologyweb.com thread was removed, but I thankfully archived the whole post over at <http://bcharchive.org/2/thearchives/showthreadc69e-2.html?t=253929>

Mr. Holding wrote a separate article at his website, using Rohrbaugh's Social Science Commentary, to defend the belief that Christians have biblical justification to insult and shame those who criticize Christian faith or the bible. When I emailed this to Rohrbaugh a few days ago, he replied that **Holding's article is an 'obvious' perversion of both the New Testament, ALL of Context Group scholarship, and Rohrbaugh's own scholarship:**

This is my lengthy email to Rohrbaugh, and his response follows:

On 12/7/2015 6:28 PM, Barry Jones wrote:
Mr. Rohrbaugh,

Thanks for your response. I believe that your work on the social world of the bible is sorely needed in light of the "read the bible like a newspaper" stuff we get from most American commentaries and churches. I was surprised very much to hear how Funk from the Jesus Seminar screamed at you because of your insisting that they consider the social context of the gospels before deciding which sayings go back to Jesus himself. That just made me dizzy that such a qualified person could so staunchly resist the very relevant context issues.

I have some other questions, no rush:

24 The Lord's bond-servant must not be quarrelsome, but be kind to all, able to teach, patient when wronged,

25 with gentleness correcting those who are in opposition, if perhaps God may grant them repentance leading to the knowledge of the truth,

26 and they may come to their senses and escape from the snare of the devil, having been held captive by him to do his will. (2Ti 2:24-1 NAU)

Does the the "gentle" in 2nd Timothy 2:24 *include* any type of insult or "shaming"? Or does 'gentle' there mean what we modern Gentiles think it means (in context...teaching in a patient

way that does not involve insults or shaming *even when instructing those who publicly criticize the faith*)?

You might be interested to know that your Social Science Commentary is being used by an evangelical apologist, who makes money selling books and promoting himself as an apologist, to establish that there is biblical justification for modern-day Christians to publicly shame/attack/insult those who publicly criticize Christian faith.

For example, in the article where he acknowledges using your work as a guide, he gives the following advice to Christians who are interacting with different types of people:

Private/questioner -- teach them.

Private/baiter -- avoid them.

Public/questioner -- teach them.

Public/baiter -- attack them.

This is in line with the much broader dichotomy between public and private discourse and encounter in the social world of the Bible.

Source: <http://www.tektonics.org/lp/madmad.php>

Is there anything *at all* in any of your published writings, or the published writings of the other Context Group authors, that would support the above-quoted **Public/baiter -- attack them** conclusion? Of course he doesn't mean *physically* attack, he only means "shame/insult/rebuke", etc.

You might be even more interested in how says that people who refuse to use riposte in modern American culture are sick and aiding and abetting that sickness:

"But we should be all things to all men and modify our approach for today's culture."

Then it's time to give up blood atonement too. No, modern culture has forbidden riposte as a way to prevent deserved criticism and to silence the critic. To that extent, the culture itself is sick and those who reject valid riposte are themselves aiding and abetting the sickness." (Ibid)

Is he misrepresenting your work there?

You might be wondering what kind of person this "apologist" is. Here is a sample from his early work showing him responding to various people who disagree with his views, and to the best of my knowledge, he refuses to acknowledge that this was unChristlike:

"And you? You're nothing but a sanctimonious ant with delusions of your own grandeur; you're nothing but a modern day Hugh waving your swollen member around and knocking people over with it or else disgusting everyone by pointing to it and shouting to everyone to look at it." ----

<http://www.ctm.org/forum/index.php?showtopic=84>

-----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such language. <https://web.archive.org/web/20050501231546/http://www.ctm.org/forum/index.php?showtopic=84>

"In your arrogance you missed it; you were so busy waving your giant pee-pee around that you bonked yourself on the head with it and didn't even notice." ----

<http://www.ctm.org/forum/index.php?showtopic=89>

-----wayback has archived this if you care to check to see whether this man was arguing in a context that morally or biblically justified such language. https://web.archive.org/web/20050501231540/http://www.ctm.org/forum/index.php?s_howtopic=89

Swollen member? Giant pee-pee? Shouting at everybody to look at one's uncovered genitalia?

The trouble with this guy is not that he is just "wrong", but that he manages to convince other apparently weak-minded people that he is a giant in the field of bible scholarship despite lacking any formal education in bible related matters. He has a tax-exempt ministry and sells books about the world of the bible and "how to reconcile alleged bible contradictions". I therefore do not think that simply ignoring him fulfills the Christian duty to positively identify false teachers and advertise a refutation of their teachings that mar the image of Christ.

Having your work abused by others is probably something that deserves your attention and commentary, even if only to make sure that he doesn't mislead others regarding Context Group work.

Thanks again for your time, and I hope to find more of your lectures on the internet!

Barry Jones

From: Richard Rohrbaugh <rbaugh@lclark.edu>

To: Barry Jones <barryjoneswhat@yahoo.com>

Sent: Tuesday, December 8, 2015 6:43 PM

Subject: Re: Nahum out of the canon?

I glanced at the stuff on the website. It is obviously a perversion of both the NT and ALL Context scholarship, including mine. But... respond? Not worth my time.

RLR

(emphasis added by Barry)

-----end of quotes.

Unless you are prepared to take the frivolous position that the bible downplays a teacher's morality and only requires that they know a whole bunch about apologetics, I'd say you need to have a rather long chat with Holding, under the guidance of the following bible passage:

15 "If your brother sins, go and show him his fault in private; if he listens to you, you have won your brother.

16 "But if he does not listen to you, take one or two more with you, so that BY THE MOUTH OF TWO OR THREE WITNESSES EVERY FACT MAY BE CONFIRMED.

17 "If he refuses to listen to them, tell it to the church; and if he refuses to listen even to the church, let him be to you as a Gentile and a tax collector. (Mat 18:15-17 NAU)

Do you agree with Jesus, namely, that there will no doubt come a day when a brother is so obstinate in sin that you must start viewing him the way first-century Jews viewed heathens and publicans?

You might take the dispensationalist view that the pre-Cross teachings of Jesus don't apply to the modern church. That would be error, the resurrected Jesus said *all* of them apply to future Gentiles: Matthew 28:20. So you won't be skipping out on your Matthew 18 discipline-obligations anytime soon.

If you are worried about a public relations disaster for disowning Holding after having endorsed him, think how much worse it will be if it becomes known that you continue to *support* this clearly disqualified man after having been informed by me that he violates some basic principles you adhere to (homosexuality is a sin, the bible being the word of God is extremely important doctrine, we should answer critics of Christianity without analogizing them to pagan gods preoccupied with the size of their penises, etc).

It is thus my intention to spread factual truths about him to those deceived persons and organizations who never realized what an authentic scumbag he really is, until a spiritually blind atheist pointed it out to them after it was too late.

Think of this as a test. Sometimes you forget about the truly painful horrific sacrifices the first-century Christians had to make. Maybe God is now testing your faith by requiring to learn something about that other part of Christianity you continually shut your eyes to...the need to get rid of those whom you already love and approve of, but who have proven by doctrine or morality to be wolves in sheep's clothing. Christianity isn't just about sending care packages to the homeless. It's also about:

5 I have decided to deliver such a one to Satan for the destruction of his flesh, so that his spirit may be saved in the day of the Lord Jesus. (1Co 5:5 NAU)

Doesn't Hebrews 6:1 say something about moving beyond the easy shit, and pressing toward maturity? Shunning a brother for unrepentant sin probably requires a lot of spiritual maturity, wouldn't you say?

Good luck running a wolf through a sorely needed wringer, and if you also manage to convince Holding to obey Matthew 5:25, 40, that would be even better :). He screwed up my planned career as paralegal and author, so no, I won't be settling for a mere \$5,000. Perhaps your greatest challenge will be to get him to give you his interpretation of all those bible verses that instruct the reader to pay off their debts honestly. Holding lives in Florida, that state that O.J. Simpson fled to because of Florida's laws which protect scumbags from having their income garnished to pay legal debts. Be sure to ask Holding "If the jury awards Doscher any money, are you going to pay it as required in the bible? Or will you hide behind a worldly law that gives more protection to debtors than the bible does?"

Oh, I forgot to mention, Holding did most of his libeling of me after he found out that I had a personality disorder, for which I receive full social security benefits (not SSI). So your

homosexual doctrinally deviant flaming foul mouthed neo liberal whatever cannot even stop himself from hurting people whom he already knows have been plagued their whole life with a disability. Put down the mocha and pick up the phone.

Christian Doscher

EXHIBIT 10

----- Forwarded message -----

From: "**Barry Jones**" <barryjoneswhat@yahoo.com>

Date: Sat, Dec 26, 2015 at 4:54 PM -0800

Subject: [ServeManager] Job #616998 Served

To: "Integrity Legal Services" <integritylegalservicesflorida@gmail.com>

Cc: "tvrphil69@gmail.com" <tvrphil69@gmail.com>, [REDACTED]
"pixelator99@hotmail.com" <pixelator99@hotmail.com>

Mr. Dennington and Ms. Barnett,

This is Christian Doscher, you served summons and complaint in the matter of Doscher v. Holding, on Defendant Holding on August 5, 2015. I have come to learn from a 9th Circuit court process server list that Dennington lives at 8000 Bridgestone Dr., Orlando, FL 32835m 407-748-3375.

I have since received discovery documents from Mr. Holding's lawyer, which indicate that Holding has been telling third parties that Barnett and Dennington have called me a stalker and expressed fear and irritation at me for all such.

I don't have a clue what Mr. Holding is talking about, since I've never stalked Barnett or Dennington. The most I ever did was email you a few times more than usual solely because Holding, in the beginning of this case, asserted that you had failed to include the summons in the documents you served on him. I did not stalk anybody, and I certainly did not ever say or do anything to express or imply I'd be some type of danger to anybody's *kids*.

Attached are discovery requests to both of you. Please review the attached Exhibit, so that you can understand my problem with Holding and thus you can answer the discovery requests more directly.

The parties are diverse by living in separate states, the amount in damages is \$75,000 or more, thus establishing diversity jurisdiction, thus I will be filing lawsuit against you in a federal district Court anyway.

As a showing of good faith, Holding has already been caught in a lie about you; since he claims a summons was never given to him during service of process, but exactly the opposite was claimed in Dennington's under-oath affidavit of service. I have all the respect in the world for you, and my inclination is to believe Holding has twisted what you said, if you said anything at all to him about me, since he rarely conveys facts about me to third-parties without twisting something, so as to make me appear worse than I really am. I'm an atheist, and he's one of those loud-mouth Christian "apologists" who feels a need to beat critics of Christianity over the head in a desperate effort to keep his followers feeling comfortable about their faith; but he crossed the line with me in our last big debate about the bible, and therefore the current lawsuit against him is one big fat statement that Holding is a world renowned expert in twisting truth so as to give a false impression. His having twisted your words would be nothing but par for the course.

Somebody is going to pay dearly in court for this. The context of Mr. Holding's third-party communication in Exhibit 1 makes clear the "stalker" stuff you allegedly said about me was about me violating *criminal* law. Hence, if Holding is telling the truth, you accused me of criminal stalking, and since that factual claim is false, that is defamation *per se*, (i.e., false imputation of criminal conduct, so jury can award presumed damages even if no actual damages are proven). If Holding is lying here, then he just destroyed his credibility even more.

If Holding is telling the truth, however, you have two choices:

- a) offer me a reasonable settlement amount so this never goes to court and your reputation in the legal world is not tarnished, or
- b) fight me in court, and you'll spend plenty before we ever get to trial, since I make full use of my right as a litigant to file required motions so as to narrow the issues for trial.

As you can tell from Exhibit 1, discovery in a civil lawsuit can be quite invasive, so if Holding was telling the truth, offering a settlement would probably be cheaper than the costs associated with answering comprehensive discovery requests.

Oh...did I mention? You live in Florida, I'll be filing the case in a Florida district Court, and Florida case law is exceptionally clear that punitive damages are available for defamation *per se*:

The singular protection afforded by Florida law to personal reputation in actions for defamations *per se* is further seen by the fact that punitive damages may be the primary relief in a cause of action for defamation *per se*. Jones v. Greeley, 25 Fla. 629, 6 So. 448, 450 (1889), held that malice is an intrinsic part of actions for defamation *per se* in order that the jury may consider punitive damages. In Nodar v. Galbreath, 462 So.2d 803 (Fla.1984), the court added that the express malice for punitive damages under Florida law is present where the evidence shows that an intention to injure the plaintiff was the primary motive for statements defamatory *per se*. [26] The history of Florida law makes clear that that liability alone for intentionally malicious defamation *per se* will support substantial punishment in punitive damages. Lawnwood Medical Center Inc. v. Sadow, 43 So. 3d 710, 727-8 (Fla. Dist. Ct. App. 2010). https://scholar.google.com/scholar_case?case=9773779881753532350&q=lawnwood+medical&hl=en&as_sdt=4,10,325,326,327

I would hardly give you this pre-suit opportunity to clear your name and avoid lawsuit, if I was a mere vexatious litigant eager to exploit any opportunity to drag somebody into court. I recognize I have enough of a cause of action against you that I can force you into court and you'll end up spending about \$5,000 in legal fees just to get to the point of summary judgment or jury trial. So why am bothering with giving you a way to save money when I know I can do that the hard expensive way?

And yes, I knew perfectly well that if I just sued you anyway for this, your lawyer would do his best to destroy Holding's credibility, which of course could only help me, and I am suing Holding without help from a lawyer...and yet I resisted these possibilities, and give you herein an opportunity to explain what's up, without it costing you any money.

Sincerely,

Christian Doscher