

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
Roy Den Hollander,

Plaintiff,

-against-

Index No.

SUMMONS

Tory Shepherd, Political Editor of The Advertiser-
Sunday Mail Messenger;
Advertiser Newspapers Pty Ltd., d/b/a The Advertiser-
Sunday Mail Messenger;
Amy McNeilage, Education Reporter for The Sydney
Morning Herald;
Fairfax Media Ltd., d/b/a The Sydney Morning Herald;

Defendants.

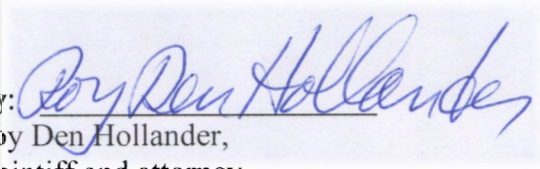
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To the above named Defendants:

YOU ARE HERBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiff within twenty (20) days after service of this Summons and Complaint, thirty (30) days, if not delivered personally to you within the State of New York. Failure to answer will result in a default judgment being taken against you for the relief demanded in the complaint.

Plaintiff designates New York County as the place of trial based on Plaintiff being a resident of New York County.

Dated: New York, New York
March 5th, 2014

By: 
Roy Den Hollander,
Plaintiff and attorney
545 East 14 Street, 10D
New York, N.Y. 10009
(917) 697-0652
royl7den@gmail.com

Defendants:

Tory Shepherd, Political Editor of The Advertiser-Sunday Mail Messenger

31 Waymouth Street
Adelaide South Australia 5000
Australia

Advertiser Newspapers Pty Ltd., d/b/a The Advertiser-Sunday Mail Messenger
31 Waymouth Street
Adelaide South Australia 5000
Australia

Amy McNeilage, Education Reporter for The Sydney Morning Herald
Fairfax Media Ltd.
1 Darling Island Road
Pyrmont NSW 2009
Australia

Fairfax Media Ltd., d/b/a The Sydney Morning Herald
1 Darling Island Road
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Index No.

**VERIFIED
COMPLAINT**

Plaintiff, by and through his attorney, Roy Den Hollander, complaining of the defendants alleges as follows:

Introduction

1. Two modern-day, book-burning, Bacchae reporters from down-under authored and published false and misleading information concerning Plaintiff with the intent and result of harming his economic interests and interfering with a prospective economic advantage by causing the University of South Australia to incinerate the section of a proposed male studies course that Plaintiff would have taught. The section was called “Men and the Law” or “Men v. the Law.”
2. The two reporters, Tory Shepherd, a.k.a. “Tory the Torch,” for The Advertiser and Amy McNeilage, a.k.a. “Amy McNeuter,” for The Sydney Morning Herald, used their power as reporters to do what weak-minded ideologues have done throughout history—employ personal attacks to prevent the spread of knowledge and ideas that they disagreed with.

3. They conducted a high-tech book-burning because they lacked the patience and will to review the contents of the online course they opposed.

4. If these two Feminist book-burners had not jumped on their broomsticks and scared the bejesus out of the administrators of the University of South Australia, students there would have had an opportunity to acquire information and consider views not available anywhere else in higher education.

5. In the 1950s, Senator Joseph McCarthy and Roy Cohn also used opprobrious accusations in order to restrict dissent or political criticism—as did the witch hunters of yesteryear while today it is the witches who are doing the hunting with pogroms against non-conformists who do not genuflect to Feminism and political correctionalism.

6. In their day, McCarthy and Cohn even attacked the overseas library program of the U.S. State Department. Card catalogs were searched for works by authors McCarthy and Cohn deemed “inappropriate.” The State Department ordered its overseas librarians to remove from their shelves “material by any controversial persons, Communists, fellow travelers, etc.”

Griffith, Robert, *The Politics of Fear: Joseph R. McCarthy and the Senate*, p. 216, University of Massachusetts Press. Some libraries actually burned the newly forbidden books.

7. Tory and Amy have continued in the McCarthy-Cohn tradition by destroying a proposed course at a public university that they deemed “inappropriate” in order to eliminate dissent, and, like McCarthy and Cohn, maintain the privileges of their positions and feelings of superiority.

8. In the 1950s, newsletters such as Counterattack and Confidential Information were published to keep track of communist and leftist organizations and individuals. Today in Australia, it is Tory at The Advertiser and Amy at The Sydney Morning Herald who keep track of “anti-feminists,” “hardliners,” and “extreme right wing groups” and individuals.

9. People like Tory and Amy, as with McCarthy and Cohn, just don't understand that "In a free country, we punish men for the crimes they commit, but never for the opinions they have." President Harry Truman. Tory, Amy and their fellow-travelers have recently made a mockery of that statement for higher education in Australia.

Facts

10. The psychological-bacchanalian frenzy of the two zealot reporters (they believe there are two sides to every story: the Feminist side and the politically correct side) began when Tory, on or about January 9, 2014, contacted Dr. Gary Misan at the University of South Australia, and, on information and belief, claimed that Plaintiff had been "identified as belonging to extreme right wing groups in the USA."

11. Dr. Misan was developing an online course "to present a balanced view and to counter some of the negative rhetoric that exists in society in general and in some areas of academe about men." (Ex. A, Tory Article, Jan. 12, 2014, The Advertiser).

12. Plaintiff had developed a three-week long section for the proposed course that was based on the quote by Sir William Blackstone from 1765, "So great a favorite is the female sex of the laws."

13. The theme of Plaintiff's section, which would have included three online lectures, assignments and class discussions, was that since the industrial revolution (1760-1830), common law countries, such as the U.S., England and Australia, had established legal systems that discriminated against men largely to their detriment while discriminating against females mainly to their benefit.

14. Plaintiff would have received a set hourly rate of compensation with a total maximum of \$1250 for teaching his section. The exact amounts were yet to be determined.

15. On the morning of January 10, 2014, Plaintiff read an email from Tory requesting his telephone number because as she said, “I’m trying to get in touch for a story I’m doing on the UniSA [University of South Australia] course you’re involved with” Plaintiff emailed her his number at 7:40 AM that same morning.

16. On January 12, 2014, Tory published an article in The Advertiser without having ever talked to the Plaintiff. (Ex. A, Tory Article, Jan. 12, 2014, The Advertiser). That seemed strange. Plaintiff had in the past worked as a writer and researcher for Metromedia News, now Fox 5 News, and Channel 7 Eyewitness News in New York City, but he could not recall anyone ever publishing or airing a story and then interviewing one of the subjects of the story afterward. Perhaps Tory has a Dr. Who view of time, or that’s the way the media works in an erstwhile penal colony.

17. Tory not only did not interview Plaintiff for her first article,¹ but she was totally ignorant of what Plaintiff was going to teach when she wrote her first article. Obviously, she follows the maxim “don’t let ignorance get in the way of a good story” that she wants to peddle as news. Sounds like the three monkeys, or is it the three stooges?

18. When dealing with yellow, female-dog-in-heat reporting such as that article, one has to understand what ideologically corrupt reporters like Tory are doing. They are not writing for the intellect of the average reader but for her gut. They write not to inform, not to enlighten, and not to elucidate, but to propagandize so as to churn the public’s emotions against those they disagree with.

¹ Tory did do a quick interview of Plaintiff for her second article, but by then, as that article makes clear, she had accomplished her purpose of destroying the men’s studies course.

19. The impression Tory created—with her chosen words, their arrangement, the out of context quotes she took from Plaintiff’s writings, and the selective quotes from others she knew agreed with her snake-oil ideology—was that Plaintiff is evil and should figuratively, if not literally, have his tongue cut out—verbal mutilation, better known as censorship.

20. In creating her knee-jerk tapestry of an “inappropriate” male, this Harpy harped on the following descriptions of Plaintiff: an “extreme” right-winger, “anti-feminist,” associates with persons who use language Tory disapproves of, believes one remaining source of power in which men still have a near monopoly is the right to bear arms, calls women’s studies witches studies, wants to eliminate the rights females have as humans, and believes Feminists oppress men.

21. So is Tory’s intended impression of the Plaintiff correct, partially correct, politically correct, evolutionarily correct or some combination? Let’s see.

22. In the 1960s, as an active member of Students for a Democratic Society, Plaintiff was accused of being a communist. Today, Tory accuses him of being a right-wing extremist. Plaintiff’s political views—based on the Declaration of Independence and the first ten amendments to the U.S. Constitution—have not changed, only the epithets have changed that conformists use to scare others into agreeing with their self-righteous, bigoted and hypocritical beliefs.

23. Plaintiff does describe himself as an anti-Feminist because by his definition of Feminism, he’s too intelligent not to be. (He’s also anti-commie, anti-nazi, anti-bigot and anti-ignorance.) Tory uses the term to paint Plaintiff as a modern-day pariah, but she not only never asked Plaintiff what he means by “Feminist” or “Feminism,” she failed to define what she meant by “feminist” or “feminism.” Was she referring to Mary Wollstonecraft’s brand described in *A Vindication of the Rights of Woman: with Strictures on Political and Moral Subjects* (1792); was

she referring to First Wave, Second Wave, Third Wave or Run-For-The-Hills feminism?

Readers of her article have no way of knowing, but the tenor of the times to which the ignorant often subscribe has “anti-feminist” connoting something bad.

24. Plaintiff defines a Feminist as a person, usually female, who believes that an accident of nature, being born female, made her superior to men in all matters under the sun. Believes men are guilty until they prove themselves innocent, and that females are innocent until proven guilty, but even then a guy is still blamed for what the female did. Tory is definitely a Feminist by this definition.

25. As for associating with persons who use language defined by Tory as “inappropriate,” Tory is not an American, although perhaps a descendant of unwelcome Britishers from Botany Bay, so it is somewhat understanding that she does not comprehend the right of association or speech guaranteed by the First Amendment to the U.S. Constitution.

26. Tory, like most PCers, use the word “inappropriate” to appropriate the free speech of others that upsets their subjective sensitivities, which often requires them to schedule an extra session with their therapists.

27. Plaintiff wonders whether Tory ever uttered a disparaging word about men when going through the trouble of maintaining blonde hair at her age. Most likely, any such colorful misandry language by her will come out in a deposition.

28. As for mainly men exercising their right to bear arms—it’s the truth. So how can the exercise of a right be extreme? It can’t.

29. When a government effectively eliminates the rights that the members of a distinct group, such as men, are entitled to, the rights that are left, if any, are their remaining sources of power. The very reason for rights is to allow the individual or individuals to exercise power against a

government that treats them as less than human. For example, free speech is the power of the pen, the right of association is the power to organize, and the Second Amendment is to give people a fighting chance against unjust state violence, such as the revolution that occurred in Kiev.

30. Thank goodness for Australians that Tory was not around for Australia's battle against the Japanese. Her anti-gun advocacy for men might have even resulted in her and Amy ending up as Japanese "comfort girls."

31. The witchcraft label has been historically applied to practices people believe influence the mind, body, or property of others against their will. Feminist linguistics is an obvious effort to control thought, speech, and action. As George Orwell wrote, "if thought corrupts language, language can also corrupt thought," "*Politics and the English Language*," 1946, and once thought is corrupted, so is a person's beliefs, and corrupted beliefs are the real power for controlling people against what otherwise would be their free will.

32. On eliminating the rights of females, every case brought by Plaintiff sought equality of rights between the sexes. Such would have eliminated preferential treatment of females, something Tory opposes, since for her equality means that "All animals are equal, but some animals are more equal than others." *Animal Farm*, George Orwell.

33. For example, in the Ladies Nights' case against New York City nightclubs, guys have to pay \$20 or more just to enter a nightclub while females enter for free. Is that fair, especially when the average girl makes more on a per unit of time basis than the average guy—\$1.09 to \$1.00, when last I looked at the U.S. Bureau of Labor Statistics.

34. On oppression by Feminists, if she's hot, she can walk all over Plaintiff in her stiletto heels.

35. More seriously, the Violence Against Women's Act was written by the Feminist Majority and NOW's Legal Defense Fund. Under a section of that Act, American men are targeted by allowing their alien wives or girlfriends to accuse them of some phony abuse. The Department of Homeland Security will hold secret proceedings to determine whether the abuse occurred, but the one person barred from the proceeding is—you guessed it—the guy accused of the abuse. The only evidence allowed comes from the alien female. That's not the back of the bus—the man is not even allowed on the bus. He's left at the station as the Feminist run VAWA Unit in Vermont runs over his career and reputation.

36. That section of the Act is nothing more than a corruption of the truth reached in a kangaroo administrative hearing and the abandonment of due process of law. Both of which were intended to harm men by the Feminists who wrote it.

37. Now, to be fair, a word Tory should look up, American females can find themselves in a similar position too, but the vast, vast majority are guys targeted by the Feminists because they knew guys were the ones trying to escape the Feminists by going overseas for girlfriends.

38. Tory, besides inventing her own false statements and false innuendos about the Plaintiff in her malicious desire to prevent the teaching of a course the contents of which she was ignorant, also enlisted the aid of quotes from girlie-guys who hope that by being sycophants, they can avoid being hexed by the Feminists.

39. A quote attributed to a Dr. Michael Flood called the course on the "margins," and a "backlash," but did this alleged expert read any of the course outlines? Don't know because Tory does not say. Flood obviously sides with Tory, and if lived in America in 1776 would have also sided with the Tories, since the founding fathers were responding to injustices and clearly outside the main body of the British Empire.

40. Dr. Ben Wadham, a lecturer at Flinders University, which was founded all of 40 years ago and is ranked at 431 in the bottom half of the QS World University Rankings 2013, is used by Tory to criticize the proposed course as “populist.” So, did he read any of the course outlines—don’t know. But he surely would have opposed the progressive programs of Teddy Roosevelt because they were “populist,” and would have gleefully “crucif[ied] mankind upon a cross of gold” because William Jennings Bryan was a “populist.”

41. Joseph McCarthy and Roy Cohn would have been proud of Tory’s effort even though those two were anti-communist while Tory is a limousine lefty. Polar opposites, but they use the same tactics, just like the Nazis and Soviets did.

42. In McCarthy and Cohn’s days, certain words were used to label persons as sub-human, an anathema, and not deserving of rights—“communist sympathizer,” “fellow traveler,” and “red,” while today Tory and the Feminists use the opprobrium associated with words such as “anti-feminist,” “right winger,” “hardliner,” and “masculine.”

43. The hunters of communists in the 1950s had their “blacklists,” which were kept by private organizations and used by the media to destroy a person’s prospective economic advantage. Today the hunters of the evolutionarily correct keep their “pinklists” on the Internet, thanks to the many man-hating Feminist bloggers out for revenge because they were not asked to the senior prom.

44. Amy, The Sydney Morning Herald reporter, threw her torch onto the electronic bonfire of knowledge unapproved by the *de facto* Feminist Ministry of Truth with her January 14, 2014 article. (Ex. B, Amy Article, Jan. 14, 2014, The Sydney Morning Herald).

45. Amy’s malice toward men’s studies and anyone who supports such or participates in such is plainly demonstrated by the chart at the beginning of her “male-baiting” article that

stereotypically denigrates those involved in such courses. (Ex. B, Amy Article, Jan. 14, 2014, The Sydney Morning Herald).

46. Amy uses the false appellation “hardline anti-feminist advocate[.]” in her lead sentence to open her McCarthyite assault of false and malicious accusations against Plaintiff.

47. Her objective is clear: restrict dissent and political criticism of that which she assumes are absolute truths in the social sciences and the only ones that Universities should be allowed to teach—feminism and political correctness.

48. Hers *modus operandi*, like Tory’s, which is most likely driven by an unbalanced urge to punish men for every stupid decision she ever made, is characterized by reckless and unsubstantiated accusations, as well as demagogic attacks on the character of persons, such as Plaintiff.

49. Amy never interviewed Plaintiff and like Tory did not know how Plaintiff defined the term Feminism; yet she intentionally used the description “anti-feminist” the way a reporter for *Pravda* in the old Soviet Union would have used the term “anti-communist.” At least the Russian commie reporters could point to intellectuals such as Marx and Lenin to define “Communism,” who can Amy point to for a definition of Feminism—her fellow coeds in consciousness lowering sessions at Charles Sturt University? Charles Sturt University is not even ranked by the QS World University Rankings 2013.

50. Instead of picking “extreme” from the reporter’s grab bag of disparaging words, Amy pulled “hardline” and “radical.” She intentionally used them to paint a false picture that Plaintiff advocates the elimination of rights for females, such as muzzling them on college campuses the way she and Tory muzzled male points of view at the University of South Australia by abusing the power of the press.

51. As with Tory, Amy also used the tactic of the big lie and the unfounded accusation against Plaintiff in the name of political correctness. (Amy most likely believes her religion is “religiously correct,” and we all know the harm that type of conviction caused throughout history.) Amy wrote that Plaintiff had “been published on radical men’s rights websites.” Okay, Amy, which ones? She doesn’t say. Was she pulling a “McCarthy” when he said he had a list of known communists working in the U.S. State Department but never made the list public? Looks like it

52. Amy uses “radical” the way Tory uses “extreme,” to depict Plaintiff as a dangerous loony because she knows her readers will never realize that the following were also called “radicals”: America’s founding fathers, abolitionists, the South Australian Fabian Society, Australian Lucy Morice, Radical Women, the Paris Commune, anti-Vietnam War demonstrators, environmentalists, etc.

53. Amy also intentionally cherry picked from Plaintiff’s case against the U.S. Department of Education, the State of New York and Columbia University charging the violation of Equal Protection, Title IX, and the Establishment Clause by financing and providing only a Women’s Studies program but no Men’s Studies program.

54. By 2016 in the U.S., females will receive 64% of the Associate’s Degrees, over 60% of the Bachelor’s Degrees, 53% of the Professional Degrees, and 66% of the Doctor’s Degrees. National Center for Educational Statistics, *Digest of Educational Statistics*, Table 258. If anyone needs help in getting into college and graduating, it is men. The courts, however, refused to recognize that it was fundamentally unfair to have a Women’s Studies program but no Men’s Studies program. After all, when a college has only a boys’ rugby team, but the girls want one, the girls get one.

55. The case tried to at least temper higher education's enthusiastic and exclusive propagation of Feminism through Women's Studies and allow countervailing masculine perspectives to enter the ivy tower to challenge Feminist orthodoxy.

56. Higher education's banishment of Men's Studies scholarship, such as that offered by Dr. Warren Farrell, advances wholesale acceptance of Feminism's invidious discrimination of men, which is inimical to the educational missions of fostering equal justice, ensuring a diverse student and alumni body, and helping both sexes find careers. It also has a deleterious impact on society as a whole, since "[n]o one should underestimate the vital role in a democracy that is played by those who guide and train our youth." *Keyishian v. Board of Regents of University of State of N. Y.*, 385 U.S. 589, 603 (1967).

57. But Amy doesn't care about that because men are the incorrect sex, so her article intentionally tries to discredit Plaintiff's prior case by failing to mention the other causes of actions and harping on the innuendo that allegations of Feminism as a religion are absurd. To Feminists and those scared of them, yes, but the U.S. Supreme Court and Court of Appeals cases on religion indicate otherwise.

58. As with Tory, Amy relies on quotes from like-minded PCers. For example,

National Union of Students president Deanna Taylor said it was concerning that the academic who founded the course, Associate Professor Gary Misan, was linked to the controversial Americans. "It's a slippery slope once you open the door to people with these views and give them a platform . . . it's not long before proposals like the ones that were rejected actually get approved," she said.

(Ex. B, Amy Article, Jan. 14, 2014, The Sydney Morning Herald).

59. A journalist, rather than an ideologue reporter, would have balanced rather than advocated this call for censorship with something along the following lines:

"To impose any strait jacket upon the intellectual leaders in our colleges and universities would imperil the future of our Nation. No field of education is so

thoroughly comprehended by man that new discoveries cannot yet be made. Particularly is that true in the social sciences, where few, if any, principles are accepted as absolutes. Scholarship cannot flourish in an atmosphere of suspicion and distrust. Teachers and students must always remain free to inquire, to study and to evaluate, to gain new maturity and understanding; otherwise our civilization will stagnate and die.” *Keyishian v. Board of Regents of University of State of N. Y.*, 385 U.S. 589, 603 (1967)(Brennan, J.).

60. Amy also used quotes from Feminist academic Eva Cox who emotionally opposes any men’s course.

61. Amy gave free play to Cox’s malice toward any potential participants in such a course by engaging in the all too common tactic that whenever the establishment of the day violates the rights of a group, and that group fights back, the establishment mocks them in the hope they will give up.²

62. Amy used one of Cox’s quotes to deride men in general for wanting attention: “men who want to complain that they haven’t had enough attention as victims, and that does worry me.” What, Cox worry? Absurd, no man would want attention from her, now Amy is a different story.

63. In another Cox quote used by Amy: “some men have difficulties with going to doctors.” It is meant as derision toward men in general, but cannot possibly apply to Plaintiff, since whenever he was injured playing Lacrosse, Rugby, or now Krav Maga, he hurried down to the emergency room to flirt with the nurses and play upon their Florence Nightingale qualities. Qualities that Cox admittedly lacks.

² Establishment means a unitary belief system held by enough influential persons so that it dominates over other beliefs in a society, such as the principles of the Declaration of Independence and the Constitution. Today, that belief system is Feminism and its sister ideology Political Correctness.

64. Amy also wrote the men's course was "rejected in 2012"—that was false. The course was "deep-six" as a result of Tory's first article and Amy's one article. The reason for the lie was, on information and belief, to keep these two online newspapers and their reporters from being sued for injurious falsehoods and tortious interference with a prospective economic advantage. Such suits rang the dealt knell of McCarthyism in the late 1950s.

65. Tory headlined her second and last article dated January 14, 2014 with "University of South Australia gives controversial Male Studies course the snip." (Ex. C, Tory Article, The Advertiser, Jan. 14, 2014). Why did she use the word "snip"? Snip means to make a quick cut. Were her hate-filled fantasies of male emasculation or circumcision at work? At the very least, it connotes feelings of malice toward men and Plaintiff.

66. Tory reports that most of the men's course, including the section that was to be taught by Plaintiff, was canceled and clearly credits her first article with the "snip":

The Advertiser revealed yesterday that some of the lecturers listed for the professional certificates had links to extreme men's rights organisations that believe men are oppressed, particularly by feminists.

The university yesterday said two short courses that would cover male health and health promotion programs targeting males had been approved, that "no other courses have been approved" and that only university staff would teach the courses.

A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not "endorse or support the controversial comments on gender issues" revealed in [the January 12, 2014] Advertiser.

67. In her closing quote, Tory endorsed Amy's advocacy that people can say whatever they want so long as it is "pro-women":

National Union of Students president Deana Taylor said a course like that proposed for the university provided "a dangerous platform for anti-women views".

68. The message is clear. On college campuses, everybody's freedom of speech is limited to parroting pro-Feminist propaganda as determined by the self-appointed members of the PC Ministry of Truth, such as the above quoted Deana Taylor, Tory, Amy, and other purveyors of ignorance and unanimity.

69. Tory and Amy clearly belong to the worldwide political-correctionalist conspiracy to imprison the thoughts, speech, and actions of people who believe in liberty rather than cowering to some influential special interest group that only has at its heart the harm of freedom loving persons.

70. The part of the media that has been infected by Feminists, such as the rag journalists Tory and Amy, uses its power to inhibit the flow of ideas and invidiously treat differently those with unpopular viewpoints by suppressing their speech in favor of politically correct speech. Today unpopular viewpoints are a masculine perspective beneficial to males.

71. The real danger that is demonstrated in this case, which Edward R. Murrow would describe as a small picture demonstrating a larger societal problem, is that

Feminism, like “[n]ationalism is a relatively recent phenomenon but at other times and places the ends have been racial or territorial security, support of a dynasty or regime, and particular plans for saving souls. As first and moderate methods to attain unity have failed, those bent on its accomplishments must resort to an ever-increasing severity. As governmental pressure toward unity becomes greater, so strife becomes more bitter as to whose unity it shall be Ultimate futility of such attempts to compel coherence is the lesson of every such effort from the Roman drive to stamp out Christianity as a disturber of its pagan unity, the Inquisition, as a means to religious and dynastic unity, the Siberian exiles as a means to Russian unity, down to [the failed] efforts of [World War II’s] totalitarian [regimes]. Those who begin coercive elimination of dissent soon find themselves exterminating dissenters. Compulsory unification of opinion achieves only the unanimity of the graveyard.”

West Virginia State Board of Education v. Barnette, 319 U.S. 624, 640-42 (1943)(Justice Jackson).

Parties

72. Plaintiff Roy Den Hollander is a resident of New York County, New York.

73. Defendant Tory Shepherd is the Political Editor for the online newspaper The Advertiser-Sunday Mail Messenger, headquartered at 31 Waymouth Street, Adelaide, South Australia 5000, Australia and, on information and belief, a resident of the State of South Australia.

74. Defendant Advertiser Newspapers Pty Ltd. is a registered Australian company, ACN 007872997, located in Adelaide, Australia, which does business under the name of The Advertiser. Service of documents on The Advertiser go to Sir Keith Murdock, 31 Waymouth Street, Adelaide, South Australia 5000, Australia.

75. Defendant Amy McNeilage is the Education Reporter for The Sydney Morning Herald headquartered at Fairfax Media, 1 Darling Island Road, Pyrmont NSW 2009, Australia and, on information and belief, a resident of the State of New South Wales, Australia.

76. The Sydney Morning Herald is part of Defendant Fairfax Media Ltd. a registered Australian company, ACN 008663161, located at 1 Darling Island Road, Pyrmont NSW 2009, Australia.

Causes of Action

77. The two causes of action against all defendants are (1) the authoring and publication of injurious falsehoods about Plaintiff and (2) tortious interference with the prospective economic advantage of Plaintiff teaching the section “Men and the Law” in a male studies course at the University of South Australia.

Personal Jurisdiction

78. Every day of the year, both The Advertiser-Sunday Mail Messenger and The Sydney Morning Herald offer/sell their newspapers through the Internet to residents of New York State, which amounts to transacting business in New York under CPLR 302(a)(1). *See Deutsche Bank Securities v. Montana Board of Investment*, 7 N.Y.3d 65 (2006).

79. The Advertiser online “provides its audience with the opportunity to become involved and be engaged on issues and stories, through debate and social media.” The Sydney Morning Herald online provides “access to exclusive discounts, events and competitions, unlimited access to our award-winning tablet apps, interactive quizzes, crosswords, Sudoku free in the iPad app.” Both are interactive websites that qualify as transacting business in New York. *See Citigroup Inc. v. City Holding Co.*, 97 F.Supp.2d 549, 564-66 (S.D.N.Y. 2000).

80. The two causes of action arise from the Defendants transacting of business in New York as cited above. *See Johnson v. Ward*, 4 N.Y.3d 516, 519 (2005).

81. The Defendants committed tortious acts without the state causing economic injury to Plaintiff within the state while persistently conducting business in New York and soliciting subscribers. CPLR 302(a)(3). Persons committing tortious acts using the Internet should expect to be within the personal jurisdiction of a state at which tortious acts were directed.

82. Further, Tory contacted Plaintiff at his email address and subsequently telephoned him at his home number in New York County to interview Plaintiff for her second article.

Damages

83. One purpose of this case is to put on notice the private “pinklisters” and those who use them that they are legally liable for the professional and financial damage they cause.

84. Plaintiff seeks compensatory damages up to \$1250 and punitive damages in the amount of \$50,000.

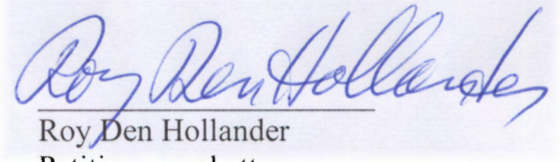
Conclusion

85. Tory and Amy wrap themselves in the flag of Feminism to justify the imposition of a unitary belief-system of Feminist orthodoxy for dictating the thought, speech, and conduct of members of the educational community and society-at-large. Thanks to these two, fellow

Feminists, and androgynous males, teachers are under constant surveillance; their pasts are combed for signs of disloyalty; their utterances are watched for clues to dangerous anti-Feminist thoughts. The Soviet Union used similar tactics to ostracize anti-communists to the Gulags. The Feminists simply keep those who disagree with them out of the universities. What are they afraid of? I thought they were strong and independent “women.”

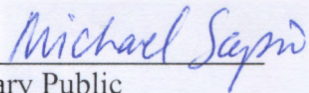
Verification

Roy Den Hollander, being duly sworn, deposes and says that I am the plaintiff in this proceeding, have written the foregoing complaint and know the contents of, which are true to my knowledge, and to those matters that I believe to be true.



Roy Den Hollander
Petitioner and attorney
545 East 14 St., 10D
New York, NY 10009
(917) 687 0652
roy17den@gmail.com

Sworn to before me on
5th day of March 2014



Notary Public

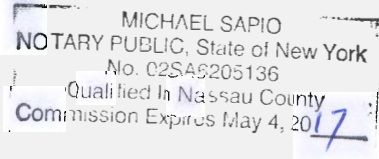


Exhibit A

Lecturers in world-first male studies course at University of South Australia under scrutiny

- POLITICAL EDITOR TORY SHEPHERD
- THE ADVERTISER
- JANUARY 12, 2014 8:08PM

LECTURERS in a "world-first" male studies course at the University of South Australia have been linked to extreme views on men's rights and websites that rail against feminism.

The lecturers' backgrounds are likely to spark controversy, but organisers of the predominantly online course, promoted as the first of its type in the world, insist they are not anti-feminist and "it's very difficult for anybody who has opposing views to get a word in".

Two lecturers have been published by prominent US anti-feminist site A Voice for Men, a site which regularly refers to women as "bitches" and "whores" and has been described as a hate site by the civil rights organisation Southern Poverty Law Centre.

The US site specifically welcomed the UniSA course as a milestone, editor Paul Elam saying it marked the end of feminists' control of the agenda.

One American US lecturer - US attorney and self-professed "anti-feminist lawyer" Roy Den Hollander - has written that the men's movement might struggle to exercise influence but that "there is one remaining source of power in which men still have a near monopoly - firearms".

He also argues that feminists oppress men in today's world and refers to women's studies as "witches' studies".

Another, US psychology professor Miles Groth, says that date-rape awareness seminars might be deterring men from going to university.

Mr Den Hollander has tried to sue ladies' nights for discrimination against men. He has likened the position of men today to black people in America's south in the 1950s "sitting in the back of the bus", and blames feminists for oppressing men.

The course, which has no prerequisites, begins this year and will canvass subjects from men's health to gender bias.

Course founder Gary Misan, from UniSA's Centre for Rural Health and Community Development, said they were "not anti-women" and that lecturers were associated with a range of groups.

"I wouldn't say any of them are extreme or anti-feminist," Dr Misan said.

"The aim of the courses are to present a balanced view and to counter some of the negative rhetoric that exists in society in general and in some areas of academe about men.

"It's very difficult for anybody who has opposing views to get a word in. As soon as somebody mentions anything they perceive as being anti-feminist, they're pilloried, and in some cases almost persecuted."

Dr Misan also said that writing something for a specific website did not necessarily suggest an affiliation.

Dr Michael Flood, from the University of Wollongong's Centre for Research on Men and Masculinity, said these types of male studies "really represents the margins".

"It comes out of a backlash to feminism and feminist scholarship. The new male studies is an effort to legitimise, to give academic authority, to anti-feminist perspectives," he said.

Flinders University School of Education senior lecturer Ben Wadham, who has a specific interest in men's rights, said there was a big difference between formal masculinity studies and "populist" male studies.

He said there were groups that legitimately help men, and then the more extreme activists.

"That tends to manifest in a more hostile movement which is about 'women have had their turn, feminism's gone too far, men are now the victims, white men are now disempowered'," he said.

"I would argue that the kinds of masculinities which these populist movements represent are anathema to the vision of an equal and fair gendered world."

Dr Wadham said that universities needed to uphold research based traditions instead of the populist, partisan approach driven by some.

Men's Health Australia spokesman and Male Studies lecturer Greg Andresen is also the Australian correspondent for US-based site *National Coalition For Men*, which declares false rape accusations to be "psychological rape", argues that talking about violence against women makes men invisible.

Asked about his connection to NCFM, he said they were the longest-running organisation in the world to look at discrimination against men and boys.

"Certainly they don't shy away from touching issues like false rape allegations, domestic violence, some of those hot topics," he said.

"We have had 20 if not 30 or 40 years where the only study on gender has been from a feminist perspective ... that's why I think this course is so long overdue," he said.

UniSA's Provost and Chief Academic Officer, Professor Allan Evans, said the courses covered important men's health issues and would equip allied health professionals who deal with men's health.

"All new courses are reviewed thoroughly prior to being offered to ensure they are suitable and beneficial to our students," he said.

Exhibit B

Sydney Morning Herald National

University of South Australia distances itself from males studies proposals

Date January 14, 2014



Amy McNeilage

Reporter

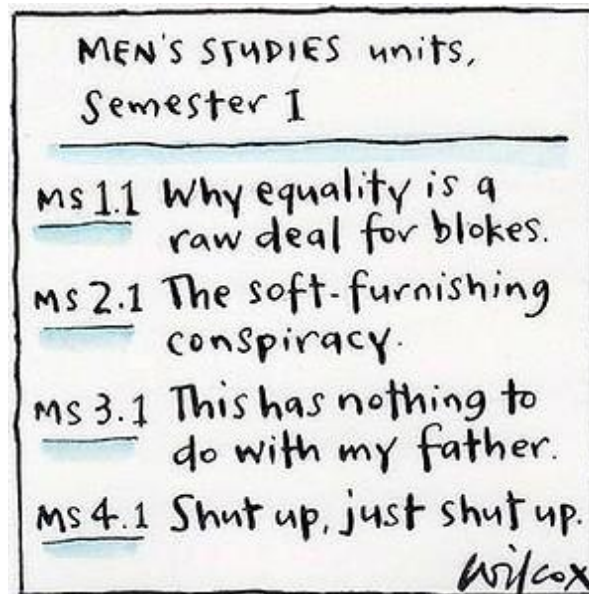
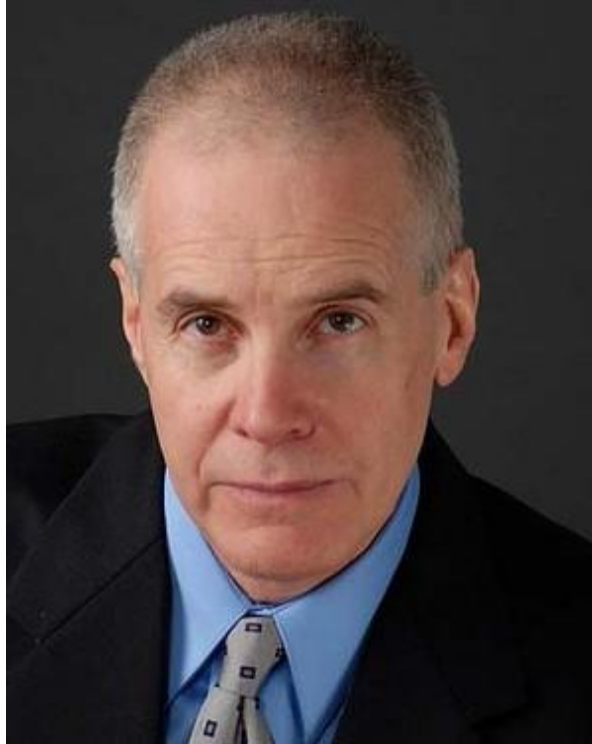


Illustration: Cathy Wilcox

The University of South Australia has distanced itself from a proposal for a series of male studies courses, some of which were to be taught by hardline anti-feminist advocates.

The university has approved one of four proposed graduate courses, a certificate in male health and health promotion, which will begin online next month.

But an original proposal by one of the university's academics outlined three further certificates, including a course called "males and sexism", which named lecturers who have been published on radical men's rights websites.



American lawyer and self-described anti-feminist: Roy Den Hollander. Photo: Supplied

Among those named was American lawyer and self-described anti-feminist Roy Den Hollander, who filed a lawsuit against Columbia University for offering women's studies courses that preached a "religionist belief system called feminism", *The New York Times* reported in 2008.

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Another proposed lecturer, Miles Groth from Wagner College in New York, wrote on the New Male Studies Facebook page on Sunday: "Two years of preparation and the support of the university from the start now seem to be jeopardy because of unnamed critics making erroneous accusations. It has been known for some years now that academe is held hostage by radical ideological feminists in the humanities and social sciences, and administration, who fear them."

The university emphasised it did not endorse views of the suggested lecturers. It said the courses, which were criticised in the media on Monday, were rejected in 2012.

Any future courses would need to go through the same approval process, a spokeswoman said.

But National Union of Students president Deanna Taylor said it was concerning that the academic who founded the course, Associate Professor Gary Misan, was linked to the controversial Americans.

"It's a slippery slope once you open the door to people with these views and give them a platform ... it's not long before proposals like the ones that were rejected actually get approved," she said.

Feminist academic Eva Cox said it was probably time to take a good look at how assumptions about gender constrain both men and women:

"Whether we need to run a university course on them, I've got my doubts," she said. "The only reason I can see that you'd be running men's studies is for the men who want to complain that they haven't had enough attention as victims, and that does worry me."

"Yes, some men have difficulties with going to doctors ... but I think we need to look at the assumptions about masculinity and femininity and how they trap both genders rather than picking on one or the other."

Exhibit C

University of South Australia gives controversial Male Studies course the snip

- TORY SHEPHERD POLITICAL EDITOR
- THE ADVERTISER
- JANUARY 14, 2014 11:15AM

CONTROVERSIAL aspects of a Male Studies course will not go ahead, the University of South Australia says - though lecturers involved with it still believe that it will.

The Advertiser revealed yesterday that some of the lecturers listed for the professional certificates had links to extreme men's rights organisations that believe men are oppressed, particularly by feminists.

The university yesterday said two short courses that would cover male health and health promotion programs targeting males had been approved, that "no other courses have been approved" and that only university staff would teach the courses.

Over the past two days, *The Advertiser* has spoken to several lecturers who believe the remainder of the proposed courses - on topics including gender bias and male power and privilege - are set to go ahead. An information sheet on the Male Studies course said it would be considered "if there is sufficient interest".

US "anti-feminist" lawyer Roy Den Hollander said yesterday that he was preparing a course that looked at how the law favours females when it comes to employment, crime, domestic relations, property, divorce and illegitimate children.

"The course is really looking back at 200 or 300 years of history and how the law treated guys and girls - and it treated girls more favourably than guys and it still does, maybe even more so.

Mr Den Hollander also stood by his claim that men's remaining source of power was "firearms". Asked whether he thought that was "extreme", he said that it was true that it was "really the only area that they control in society now".

He said that even where men dominate areas such as boards and politics, they are still enforcing the belief system of feminism.

However, Mr Den Hollander is unlikely to be able to tell Adelaide students about similarities he sees between the men's rights movement and the civil rights movement, as the university says the subject he is down to teach was never approved.

A statement from the university issued yesterday said only UniSA staff would develop and teach courses, and that the university did not "endorse or support the controversial comments on gender issues" revealed in yesterday's *Advertiser*.

Yesterday men's rights activists attacked criticism of the course as lies, corruption and fascism.

"As we know, feminist ideologues are well placed with the luxury of great control. But while this is clearly an exercise in their power, it is an exercise in power that is waning," Paul Elam, editor of the anti-feminist site A Voice For Men wrote, adding the "only way forward" was "straight through them".

National Union of Students president Deana Taylor said a course like that proposed for the university provided "a dangerous platform for anti-women views".