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FILED
 11 MAY 26 PM 3:01
 CLERK U.S. DISTRICT COURT
 CENTRAL DIST. OF CALIF.
 LOS ANGELES

7 *Counsel for Plaintiff and all others similarly situated*

8
 9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA**

11 SACV11-00813 AG (ANX)

12 CODY BROCK, on behalf of himself
 and all others similarly situated,

Case No.

13 Plaintiff,

**CLASS ACTION
 COMPLAINT FOR:**

BY FAX

14 v.

15 MYLIFE.COM, INC., a Delaware
 16 Corporation, and DOES 1-10, inclusive,

1. California False Advertising Act,
 California *Business & Professions*
 Code § 17500 et seq.

17 Defendants.

2. California Unfair Competition
 Law, California *Business &*
Professions Code § 17200 et seq.

3. California Consumer Legal
 Remedies Act, California *Civil Code* §
 1770 et seq.

DEMAND FOR JURY TRIAL

LAW OFFICES
 KIRTLAND & PACKARD LLP

28

1 Plaintiff, Cody Brock brings this action on behalf of himself and all others
2 similarly situated against Defendant MyLife.com, Inc. ("MyLife"). Plaintiff makes
3 the following allegations upon information and belief, except as to allegations
4 specifically pertaining to himself, which is based on personal knowledge.

5 **PARTIES**

- 6 1. Plaintiff Cody Brock is a resident of Orange County, California. In early
7 2011, he saw an ad stating that someone could be looking for him on
8 MyLife.com and he could find out whom for free. He therefore signed up for
9 MyLife's services and paid \$45 for three months. In reality, no one was
10 looking for Mr. Brock. Plaintiff reasonably relied on MyLife's
11 advertisements and was harmed in signing up for MyLife.com's services
12 based on the false advertising that someone was looking for him, when in fact
13 that was not the case.
- 14 2. Defendant MyLife operates the website www.mylife.com and is a Delaware
15 corporation, registered with the California Secretary of State to conduct
16 business in California. MyLife's principal place of business is in Los
17 Angeles, California.
- 18 3. Plaintiff does not know the true names or capacities of the persons or entities
19 sued herein as DOES 1-10, inclusive, and therefore sues such Defendants by
20 such fictitious names. Plaintiff is informed and believes, and upon such
21 information and belief alleges, that each of the DOE Defendants is in some
22 manner legally responsible for the damages suffered by Plaintiff and the
23 members of the class as alleged herein. Plaintiff will amend this complaint to
24 set forth the true names and capacities of these Defendants when they have
25 been ascertained, along with appropriate charging allegations, as may be
26 necessary.
- 27 4. At all times herein mentioned, Defendants and each of them were the agents,
28 principals, servants, employees and subsidiaries of each of the remaining

1 Defendants and were at all times acting within the purpose and scope of such
2 agency, service, and employment and directed, consented, ratified, permitted,
3 encouraged and approved the acts of each remaining Defendants.

4 **JURISDICTION AND VENUE**

- 5 5. This Court has subject matter jurisdiction pursuant to the Class Action
6 Fairness Act of 2005, 28 U.S.C. § 1332(d), because at least one Class
7 member is of diverse citizenship from one Defendant; there are more than
8 100 Class members nationwide; the aggregate amount in controversy exceeds
9 \$5,000,000; and minimal diversity exists.
- 10 6. Venue is proper in this District under 28 U.S.C. § 1391(a) because a
11 substantial part of the events or omissions giving rise to the claims occurred
12 and/or emanated from this District, and Defendants have caused harm to
13 Class members residing in this District.

14 **FACTUAL ALLEGATIONS**

- 15 7. Defendant runs the website MyLife.com, which claims to “Find everyone.
16 All in one place.” On the website it states: “Curious about someone from
17 your past? Use the Internet’s most comprehensive People Search service to
18 find old friends, family, classmates, or coworkers.” But, Mylife.com is not a
19 free service like many other social websites; it charges customers a monthly
20 fee and leaves these paying customers feeling as if they have been scammed
21 by Defendant.
- 22 8. The way in which Defendant advertises is false and misleading. There are
23 emails and advertisements sent to individuals, along with television ads,
24 which state that someone is searching for them. Many individuals, believing
25 that someone is actually searching for them, click on the email or
26 advertisement, or look up MyLife.com, and end up paying a fee to
27 Mylife.com to figure out who is searching for them. Once the individual
28 provides credit card payment information, there is a result list of invented

1 names of people who are supposedly searching for you. Thus the customers
2 who relied on the advertisements of Defendant are damaged in that they paid
3 for a completely worthless service.

- 4 9. Beyond this bait and switch tactic, another problem is that Defendant,
5 through MyLife.com, often does not just charge a one time monthly fee to
6 individuals signing up for its services and often ends up charging at once for
7 a six month term or an entire year membership of over \$100, despite the fact
8 that the individual only wants to sign up for one month.
- 9 10. There are numerous complaint boards on the internet with similar stories of
10 the way that MyLife.com dupes consumers into paying for a service that ends
11 up being completely worthless, along with describing Defendant's unfair
12 billing practices. A few of such complaints are as follows:

13 *As with all the complaints I have read, I selected to try this service for*
14 *one month @ \$12.95 for the month. Mylife.com charged my credit over*
15 *\$150 for an entire year without any confirmation[sic] that they made*
16 *this charge. If they would have presented the fact that they were doing*
17 *this, I would have never signed with this useless service.¹*

18 Another unhappy individual wrote:

19 *The TV ads imply My Life is a free service. It's not. The ads say My*
20 *Life has millions of messages accessible by just going to their website.*
21 *Once again, a lie. My Life showed 57 people who were "searching for*
22 *me". I'd never heard of ANY of them. I signed up thinking perhaps I*
23 *could hook up with some guys I was in the military with. Turns out that*
24 *searching FOR someone requires another membership which costs*
25 *even more than "getting messages from people searching for you".*

26
27
28 ¹<http://www.complaintnow.com/-credit-card-ripoff-/complaint/complaints/message/show/13073/0/156775/0>

1 *This is a total scam.²*

2 A third example of an unhappy customer follows:

3 *This website lures you in based on false information that they have*
4 *information about people that are searching for you. Their registration and*
5 *subscription system is misleading and tricks you into a long term*
6 *subscription by calling it a "monthly Subscription" but bills you for an entire*
7 *year. They offer no refunds on subscriptions ...this should be a big tell in*
8 *itself ... but it is difficult to find this info until its too late! They are a*
9 *complete scam ...they tell you there are 10 people searching for you but in*
10 *reality there are likely none... I am not sure how they have been able to*
11 *operate this long ...not they were formally known as reunion.com but*
12 *apparently shut down due to unethical practices... here they go again ...*
13 *Please do not fall for this Scam as I did!!³*

14 **CLASS ACTION ALLEGATIONS**

15 11. This action is properly maintainable as a class action. Plaintiff brings this
16 class action for injunctive relief and damages on behalf of the following
17 class:

18 All persons located within the United States who paid any
19 amount for a MyLife.com subscription at any time during
20 the four years preceding the filing of the initial Complaint
21 (the "Class").

22 12. Excluded from the class are governmental entities, Defendant, any entity in
23 which Defendant has a controlling interest, and Defendant's officers,
24 directors, affiliates, legal representatives, employees, co-conspirators,
25 successors, subsidiaries, and assigns. Also excluded from the Class is any
26

27 ²<http://www.complaintsboard.com/complaints/mylifecom-c412501.html>

28 ³<http://www.complaintsboard.com/complaints/mylifecom-c367561.html>

1 judge, justice or judicial officer presiding over this matter and the members
2 of their immediate families and judicial staff.

3 13. **Numerosity:** The proposed Class is so numerous that individual joinder of
4 all its members is impracticable. Due to the nature of the trade and
5 commerce involved, Plaintiff believes that the total number of Class members
6 is at least in the tens of thousands and members of the Class are numerous
7 and geographically dispersed across the United States. While the exact
8 number and identities of the Class members are unknown at this time, such
9 information can be ascertained through appropriate investigation and
10 discovery. The disposition of the claims of the Class members in a single
11 class action will provide substantial benefits to all parties and to the Court.

12 14. **Common Question of Law and Fact Predominate:** There is a well-defined
13 community of interest in the questions of law and fact involved affecting the
14 Class and these common questions predominate over any questions that may
15 affect individual Class members. There are many questions of law and fact
16 common to the representative Plaintiff and the Class, and those questions
17 substantially predominate over any questions that may affect individual Class
18 members. Common questions of fact and law include, but are not limited to,
19 the following:

- 20 i. whether Defendant's marketing and advertising were and are
21 misleading;
- 22 ii. whether Defendant's representations were likely to mislead and
23 did in fact mislead Plaintiff and Class members;
- 24 iii. whether Defendant sent false solicitations telling potential
25 victims that "someone" is searching for them;
- 26 iv. whether Defendant misrepresented MyLife's prices and/or
27 placed unauthorized charges on subscribers' accounts;
- 28 v. whether Defendant's conduct as alleged herein violates the

- 1 Unfair Competition Law;
- 2 vi. whether Defendant's conduct as alleged herein violates the
- 3 Consumer Legal Remedies Act;
- 4 vii. whether Defendant's conduct as alleged herein violates the False
- 5 Advertising Law;
- 6 viii. whether Plaintiff and Class members have sustained monetary
- 7 loss and the proper measure of that loss;
- 8 ix. whether Plaintiff and Class members are entitled to declaratory
- 9 and injunctive relief; and
- 10 x. whether Defendant was willful, deceptive and oppressive in its
- 11 conduct.

12 15. These common questions of law and fact predominate over questions that

13 may affect individual Class members in that the claims of all Class members

14 for each of the claims herein can be established with common proof.

15 Additionally, a class action would be "superior to other available methods for

16 the fair and efficient adjudication of the controversy," because (1) Class

17 members have little interest in individually controlling the prosecution of

18 separate actions because the individual damages claims of each Class

19 member are not substantial enough to warrant individual filings and (2)

20 because the disputed advertisements are common to all Class members and

21 because resolution of the claims of Plaintiff will resolve the claims of the

22 remaining Class, certification does not pose any manageability problems.

23 16. **Typicality:** Plaintiff's claims are typical of the claims of the members of the

24 Class. Plaintiff and all members of the Class have been similarly affected by

25 Defendant's common course of conduct since they all relied on Defendant's

26 representations and paid for Defendant's service based on those

27 representations.

28 17. **Adequacy of Representation:** Plaintiff will fairly and adequately represent

1 and protect the interests of the Class. Plaintiff has retained counsel with
2 substantial experience in handling complex class action litigation. Plaintiff
3 and his counsel are committed to prosecuting this action vigorously on behalf
4 of the Class and have the financial resources to do so.

5 18. **Superiority of Class Action:** Plaintiff and the members of the Class suffered
6 and will continue to suffer harm as a result of Defendant's unlawful and
7 wrongful conduct. A class action is superior to other available methods for
8 the fair and efficient adjudication of the present controversy. Class members
9 have little interest in individually controlling the prosecution of separate
10 actions because the individual damages claims of each Class member are not
11 substantial enough to warrant individual filings. In sum, for many, if not
12 most, Class members, a class action is the only feasible mechanism that will
13 allow them an opportunity for legal redress and justice.

14 19. Adjudication of individual class members' claims with respect to the
15 Defendant would, as a practical matter, be dispositive of the interests of other
16 members not parties to the adjudication, and could substantially impair or
17 impede the ability of other class members to protect their interests.

18 **FIRST CAUSE OF ACTION**

19 **Business and Professions Code § 17500**

20 **(Violation of the False Advertising Act)**

21 **(By Plaintiff and the Class Against All Defendants)**

22 20. Plaintiff hereby incorporates paragraphs 1-19 above as if set forth in full.

23 21. California *Business and Professions Code* § 17500 provides that "[i]t is
24 unlawful for any ... corporation . . . with intent . . . to dispose of . . . personal
25 property . . . to induce the public to enter into any obligation relating thereto,
26 to make or disseminate or cause to be made or disseminated . . . from this
27 state before the public in any state, in any newspaper or other publication, or
28 any advertising device, or by public outcry or proclamation, or in any other

- 1 manner or means whatever, including over the Internet, any statement . . .
2 which is untrue or misleading, and which is known, or which by the exercise
3 of reasonable care should be known, to be untrue or misleading”
- 4 22. Defendant misled consumers by making untrue statements and failing to
5 disclose what is required as stated in the Code, as alleged above.
- 6 23. As a direct and proximate result of Defendant’s misleading and false
7 advertising, Plaintiff and the members of the Class have suffered injury in
8 fact and have lost money or property.
- 9 24. The misleading and false advertising described herein presents a continuing
10 threat to Plaintiff and the Class in that Defendant persists and continues to
11 engage in these practices, and will not cease doing so unless and until forced
12 to do so by this Court. Defendant’s conduct will continue to cause
13 irreparable injury to consumers unless enjoined or restrained.

14 **SECOND CAUSE OF ACTION**

15 **Business and Professions Code § 17200, et seq.**

16 **(Violation of the Unfair Competition Law)**

17 **(By Plaintiff and the Class Against All Defendants)**

- 18 25. Plaintiff hereby incorporates paragraphs 1-24 above as if set forth in full.
- 19 26. California *Business and Professions Code* § 17200, *et seq.*, (the “Unfair
20 Competition Law” or “UCL”) authorizes private lawsuits to enjoin acts of
21 “unfair competition” which includes any unlawful, unfair, or fraudulent
22 business practice.
- 23 27. The UCL imposes strict liability. Plaintiff need not prove Defendant
24 intentionally or negligently engaged in unlawful, unfair or fraudulent
25 business practices—but only that such practices occurred.
- 26 28. The material misrepresentations, concealment, and non-disclosures by
27 Defendants MyLife and DOES 1-10 as part of their marketing and
28

- 1 advertising of MyLife services are unlawful, unfair, and fraudulent business
2 practices prohibited by the UCL.
- 3 29. In carrying out such marketing, Defendant has violated the Consumer Legal
4 Remedies Act, the False Advertising Law, and various other laws,
5 regulations, statutes, and/or common law duties. Defendant's business
6 practices alleged herein, therefore, are unlawful within the meaning of the
7 UCL.
- 8 30. The harm to Plaintiff and members of the public outweighs the utility of
9 Defendant's practices and, consequently, Defendant's practices, as set forth
10 fully above, constitute an unfair business act or practice within the meaning
11 of the UCL.
- 12 31. Defendant's practices are additionally unfair because they have caused
13 Plaintiff and the class substantial injury, which is not outweighed by any
14 countervailing benefits to consumers or to competition, and is not an injury
15 the consumers themselves could have reasonably avoided.
- 16 32. Defendant's practices, as set forth above, have misled the general public in
17 the past and will mislead the general public in the future. Consequently,
18 Defendant's practices constitute an unlawful and unfair business practice
19 within the meaning of the UCL.
- 20 33. Pursuant to California *Business and Professions Code* § 17204, an action for
21 unfair competition may be brought by any "person . . . who has suffered
22 injury in fact and has lost money or property as a result of such unfair
23 competition." Defendant's wrongful misrepresentations and omissions have
24 directly and seriously injured Plaintiff and the putative class by causing them
25 to pay for MyLife's subscription service based upon false and misleading
26 marketing and advertising.
- 27 34. The unlawful, unfair, and fraudulent business practices of Defendant are
28 ongoing and present a continuing threat that members of the public will be

1 misled into purchasing a MyLife subscription service based upon false and
2 misleading marketing and advertising.

3 35. Pursuant to the UCL, Plaintiff is entitled to preliminary and permanent
4 injunctive relief ordering Defendant to cease this unfair competition, as well
5 as disgorgement and restitution to Plaintiff and the Class of all of
6 Defendant's revenues associated with their unfair competition, or such
7 portion of those revenues as the Court may find equitable.

8 **THIRD CAUSE OF ACTION**

9 **Civil Code § 1770, et seq.**

10 **(Violation of the Consumer Legal Remedies Act)**

11 **(By Plaintiff and the Class Against All Defendants)**

12 36. Plaintiff hereby incorporates paragraphs 1-35 above as if set forth in full.

13 37. The Consumer Legal Remedies Act ("CLRA") creates a non-exclusive
14 statutory remedy for unfair methods of competition and unfair or deceptive
15 acts or business practices. *See Reveles v. Toyota by the Bay*, 57 Cal. App. 4th
16 1139, 1164 (1997). Its self-declared purpose is to protect consumers against
17 these unfair and deceptive business practices, and to provide efficient and
18 economical procedures to secure such protection. Cal. Civil Code § 1760 *et*
19 *seq.* The CLRA was designed to be liberally construed and applied in favor
20 of consumers to promote its underlying purposes. *Id.*

21 38. Plaintiff has standing to pursue this claim as Plaintiff purchased a MyLife
22 subscription, which was worthless to him. He purchased the
23 subscription after viewing an advertisement that someone
24 was looking for him, when in fact, no one was looking for
25 him and the subscription payment to MyLife was a
26 complete waste of money for Plaintiff.

27 39. Defendant's wrongful business practices constituted, and constitute, a
28 continuing

1 course of conduct in violation of the California Consumer Legal Remedies
2 Act since Defendant is still representing that its services have characteristics
3 and abilities which are false and misleading, and have injured Plaintiff and
4 the Class.

5 40. More specifically, Plaintiff alleges that Defendant has violated paragraphs 5,
6 7, and 9 of California *Civil Code* § 1770(a) by engaging in the unfair and/or
7 deceptive acts and practices set forth herein. Defendant's unfair and
8 deceptive business practices in carrying out the marketing program described
9 above were and are intended to and did and do result in Plaintiff and Class
10 members purchasing Defendant's services, in violation of the CLRA. Cal.
11 *Civil Code* § 1770, *et seq.*

12 41. As a result of Defendant's unfair and/or deceptive business practices,
13 Plaintiff and all consumers who purchased Defendant's services have
14 suffered damage and lost money in that they paid for services that did not
15 have the benefits as represented. Plaintiff seeks and is entitled to an order
16 enjoining Defendant from continuing to engage in the unfair and deceptive
17 business practices alleged herein.

18 42. Pursuant to Section 1782 of the CLRA, Plaintiff intends to notify Defendant
19 in writing of the particular violations of Section 1770 of the CLRA (the
20 "Notice Letter"). If Defendant fails to comply with Plaintiff's demands
21 within thirty days of receipt of the Notice Letter, pursuant to Section 1782 of
22 the CLRA, Plaintiff will amend this Complaint to further request damages
23 under the CLRA.

24
25 **PRAYER FOR RELIEF**

26 **WHEREFORE**, Plaintiff, individually and on behalf of the Class, prays for
27 relief and judgment as follows:
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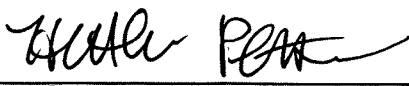
- 1 1. For preliminary and permanent injunctive relief enjoining Defendant,
2 its agents, servants and employees, and all persons acting in concert with them,
3 from engaging in, and continuing to engage in, the unfair, unlawful and/or
4 fraudulent business practices alleged above and that may yet be discovered in the
5 prosecution of this action;
- 6 2. For certification of the putative class;
- 7 3. For restitution and disgorgement of all money or property wrongfully
8 obtained by Defendant by means of its herein-alleged unlawful, unfair, and
9 fraudulent business practices;
- 10 4. For an accounting by Defendant for any and all profits derived by
11 Defendant from their herein-alleged unlawful, unfair, and/or fraudulent conduct
12 and/or business practices;
- 13 5. An award of statutory damages according to proof, except that no
14 damages are currently sought on Plaintiff's Cause of Action regarding the
15 Consumer Legal Remedies Act at this time;
- 16 6. An award of general damages according to proof, except that no
17 damages are currently sought on Plaintiff's Cause of Action regarding the
18 Consumer Legal Remedies Act at this time;
- 19 7. An award of special damages according to proof, except that no
20 damages are currently sought on Plaintiff's Cause of Action regarding the
21 Consumer Legal Remedies Act at this time;
- 22 8. Exemplary damages, except that no damages are currently sought on
23 Plaintiff's Cause of Action regarding the Consumer Legal Remedies Act at this
24 time;
- 25 9. For attorneys' fees and expenses pursuant to all applicable laws
26 including, without limitation, Code of Civil Procedure §1021.5, the CLRA, and the
27 common law private attorney general doctrine;
- 28 10. For costs of suit; and

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11. For such other and further relief as the Court deems just and proper.

DATED: May 23, 2011

KIRTLAND & PACKARD LLP

By: 
MICHAEL LOUIS KELLY
BEHRAM V. PAREKH
HEATHER M. PETERSON
Counsel for Plaintiff and the Class

LAW OFFICES
KIRTLAND & PACKARD LLP

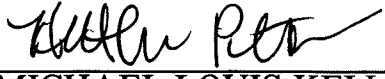
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DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues so triable.

DATED: May 23, 2011

KIRTLAND & PACKARD LLP

By: 

MICHAEL LOUIS KELLY
BEHRAM V. PAREKH
HEATHER M. PETERSON
Counsel for Plaintiff and the Class

LAW OFFICES
KIRTLAND & PACKARD LLP

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Andrew Guilford and the assigned discovery Magistrate Judge is Arthur Nakazato.

The case number on all documents filed with the Court should read as follows:

SACV11- 813 AG (ANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT

for the
Central District of California

Cody Brock, on behalf of himself and
all others similarly situated,

Plaintiff

v.

MyLife.com, Inc., a Delaware
Corporation and DOES 1-10, inclusive,

Defendant

SACV11-00813
Civil Action No.

AG (ANX)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

MyLife.com, Inc.
12400 Wilshire Blvd
Suite 1500
Los Angeles, CA 90025

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Michael Louis Kelly, Kirtland & Packard LLP, 2361 Rosecrans Avenue, Fourth Floor, El Segundo, CA 90245

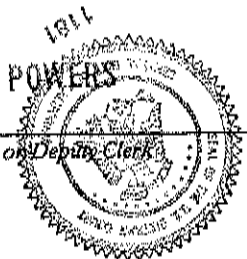
If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: MAY 26 2011

CLERK OF COURT

CHRISTOPHER POWERS

Signature of Clerk or Deputy Clerk



UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself)

Cody Brock, on behalf of himself and all others similarly situated,

DEFENDANTS

MyLife.com, Inc., a Delaware Corporation, and DOES 1-10, inclusive,

(b) Attorneys (Firm Name, Address and Telephone Number, if you are representing yourself, provide same.)

Michael Louis Kelly - SBN 82063 Kirtland & Packard LLP 2361 Rosecrans Avenue, Fourth Floor

Attorneys (If Known)

El Segundo, CA 90245 310.536.1000

II. BASIS OF JURISDICTION (Place an X in one box only.)

- 1 U.S. Government Plaintiff 2 U.S. Government Defendant 3 Federal Question (U.S. Government Not a Party) 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)

- Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country Incorporated or Principal Place of Business in this State Incorporated and Principal Place of Business in Another State Foreign Nation

IV. ORIGIN (Place an X in one box only.)

- 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify): 6 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No MONEY DEMANDED IN COMPLAINT: \$ To Be Determined

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

28 U.S.C. Section 1332(d)(2)(A) - Class Action Fairness Act. Plaintiff alleges that Defendant falsely misled The Putative Class to sign up for services.

VII. NATURE OF SUIT (Place an X in one box only.)

Table with columns: OTHER STATUTES, CONTRACT, REAL PROPERTY, TORTS - PERSONAL INJURY, TORTS - PERSONAL PROPERTY, TORTS - PRISONER PETITIONS, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS. Includes various legal categories and checkboxes.

FOR OFFICE USE ONLY: Case Number:

SACV11-00813

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? [X] No [] Yes

If yes, list case number(s):

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? [X] No [] Yes

If yes, list case number(s):

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) [] A. Arise from the same or closely related transactions, happenings, or events; or
[] B. Call for determination of the same or substantially related or similar questions of law and fact; or
[] C. For other reasons would entail substantial duplication of labor if heard by different judges; or
[] D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.

[] Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

Table with 2 columns: County in this District, California County outside of this District; State, if other than California; or Foreign Country. Row 1: Brock - Orange

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.

[] Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

Table with 2 columns: County in this District, California County outside of this District; State, if other than California; or Foreign Country. Row 1: MyLife.com, Inc. - Los Angeles

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

Table with 2 columns: County in this District, California County outside of this District; State, if other than California; or Foreign Country. Row 1: Brock - Orange

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):

Handwritten signature of Michael Louis Kelly

Date May 25, 2011

Michael Louis Kelly

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law.

Key to Statistical codes relating to Social Security Cases:

Table with 3 columns: Nature of Suit Code, Abbreviation, Substantive Statement of Cause of Action. Rows include codes 861 (HIA), 862 (BL), 863 (DIWC), 863 (DIWW), 864 (SSID), 865 (RSI).