

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

Karen Beth Young

**Plaintiff**

And

Facebook, INC,

**Defendant**

) Case No.: 110CV178574

)  
) **EX PARTE APPLICATION FOR PRELIMINARY**  
) **INJUNCTION TO PRESERVE EVIDENCE,**  
) **AND SUPPORTING PAPERS**  
)

Date: August 9, 2010

Time: 8:15 am

Location: Superior Court of California

191 N. First Street

San Jose, Ca. 95113

Judge: William J. Elfving

Date Action Filed: August 9, 2010

Trial Date: Not Set

APPLICATION - 1

1 Plaintiff, Karen Beth Young hereby moves for an order  
2 of preliminary injunction. This application is made on the  
3 grounds that (1) any/all of the plaintiff's electronic account  
4 information with Facebook, INC. is evidence in this case,  
5 (2) the "DEAR LORD, THIS YEAR YOU TOOK MY FAVORITE  
6 ACTOR, PATRICK SWAYZIE. YOU TOOK MY FAVORITE ACTRESS,  
7 FARAH FAWCETT. YOU TOOK MY FAVORITE SINGER, MICHAEL  
8 JACKSON. I JUST WANTED YOU TO KNOW, MY FAVORITE  
9 PRESIDENT IS BARACK OBAMA. AMEN" Facebook page is  
10 evidence in this case, (3) the "Petition to remove  
11 Facebook group praying for President Obama's death"  
12 Facebook page is evidence in this case, (4) the  
13 plaintiff has and continues to suffer harm as a  
14 result of defendant's actions and inactions. A prior  
15 application was made on Wed. August 4, 2010 for  
16 an ex parte order. This application was titled  
17 "EX PARTE APPLICATION FOR PRELIMINARY INJUNCTION AND  
18 NOTICE OF MOTION FOR PERMANENT INJUNCTION,  
19 SUPPORTING DECLARATION OF KAREN BETH YOUNG" and  
20 the motion was denied in whole due to law  
21 CRC 3.1100-3.1116, CRC 3.1200-3.1207, &  
22 CCP 527 et seq by the Honorable William J. Efring.  
23 This application is being made to comply with the  
24 requirements for filing as mentioned above and  
25 to once again state the need to protect and

1 preserve case evidence and witness information that  
2 has been temporarily deleted by defendant. The  
3 defendant wants to permanently delete plaintiff's  
4 information. In support of this application, I,  
5 the undersigned, declare:

6 (1) I am the moving party and plaintiff

7 (2) The name, address and telephone number of the  
8 defendant Facebook, INC. is: Facebook, INC.

9 1601 South California Avenue Palo Alto, California  
10 94304 phone - 650-543-4800 Fax-650-543-4801

11 (3) On Friday August 6, 2010, at 9 am, I informed  
12 Facebook, INC. of the date, time and place that the  
13 above application for an order of preliminary injunction  
14 would be made. This was done by serving Facebook, INC.  
15 with a copy of this application and all supporting papers  
16 at Facebook headquarters.

17 (4) Facebook, INC. did not state whether or not they  
18 would oppose this application.

19 (5) This order is necessary for the preserving of  
20 electronic information. Defendant has temporarily  
21 deleted evidence in this case and seeks to permanently  
22 delete account and page information. Harm and undue  
23 hardship has already been inflicted and irreparable  
24 damage would occur if the defendant were not  
25 ordered to comply with the preservation of evidence

1 in this case. Currently, relationships are strained and  
2 broken creating additional problems and hurt. All account  
3 information to include the following pages: "Cancer Forum",  
4 "Cartesian Plane For The Cure", "Karen Beth Young - Public  
5 Figure", "Join Karen Petition Facebook Say No To 5000 Friends",  
6 and the two previously mentioned pages "DEAR CEO"  
7 and "Petition to remove" are evidence in this case.  
8 There are approximately 4300 people on the Facebook  
9 page Karen Beth Young, 1600 on the Cancer Forum, 2700  
10 on Cartesian Plane For The Cure, 1100 on the Karen Beth  
11 Young - Public Figure, and 125 on the Join Karen Petition  
12 Facebook Say No To 5000 Friends. All previous  
13 communications and actions relating to these individuals  
14 is evidence in this case and in danger of being  
15 permanently deleted by defendant. Ex parte relief  
16 is needed to immediately preserve and protect all  
17 of this evidence. In addition to friends and  
18 relationships, there are personal threats of harm  
19 and violence to include ongoing hatred, discrimination,  
20 pornography, KKK acts of intimidation and the hate  
21 page. The petition page to remove the hate  
22 page praying for death is evidence as it was  
23 used as a place of response and help. All  
24 causes of action in this case are related to  
25 all of the above pages and account information.

APPLICATION-4

1 I declare under penalty of perjury under  
2 the laws of the State of California that  
3 the foregoing is true and correct.  
4

5  
6 Date: August 9, 2010  
7

8 

9  
10 Karen Beth Young  
11

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA CLARA

Karen Beth Young

Plaintiff

And

Facebook, INC.

Defendant

) Case No.: 110CV178574

) ORDER FOR PRELIMINARY INJUNCTION

Date: August 9, 2010

Time: 8:15 am

Location: Superior Court of California

191 N. First Street

San Jose, Ca. 95113

Judge: William J. Elving

Date Action Filed: August 9, 2010

Trial Date: Not Set

1 Application having been made by Karen Beth Young, moving party, and good cause appearing therefor,  
2 IT IS ORDERED that (1) Any/all of the "Karen Beth Young" electronic account information be preserved as  
3 evidence to include all; pages, messages, instant messages, photos, posts or other information pertaining to the  
4 account. (2) Any/all of the "DEAR-LORD-THIS-YEAR-YOU-TOOK-MY-FAVORITE-ACTOR-PATRICK-  
5 SWAYZIE-YOU-TOOK-MY-FAVORITE-ACTRESS-FARAH-FAWCETT-YOU-TOOK-MY-FAVORITE-  
6 SINGER-MICHAEL-JACKSON-I-JUST-WANTED-TO-LET-YOU-KNOW-MY-FAVORITE-PRESIDENT-  
7 IS-BARACK-OBAMA-AMEN" electronic account information, past, present and future be preserved as  
8 evidence.(3) Any/all of the "Petition to remove facebook group praying for President Obama's death" electronic  
9 account information, past, present and future be preserved as evidence.

10  
11  
12  
13  
14  
15 Dated: August 9, 2010  
16  
17  
18  
19  
20 Judge of the Superior Court.  
21  
22  
23  
24  
25  
26  
27  
28