

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAMES REDDING *

P.O. BOX 3411 *

WASHINGTON, DC 20010 *

Plaintiff(s) *

vs. *

Civil No.: 17-674
(Leave blank To be filled in by Court.)

JUSTIA, INC. *

r/a CSS SERVICES OF NEVADA, INC. *
2215-B RENAISSANCE DRIVE *
LAS VEGAS, NV 89119 *

TIMOTHY JAMES STANLEY *
5463 CARDIOVASCULAR CENTER *
ANN ARBOR, MI 48109 *

ELIZABETH A. McCLANAHAN. *
OFFICE OF ATTORNEY GENERAL *
900 EAST MAIN STREET *
RICHMOND, VIRGINIA 23219 *

JAMES W. HALEY, JR. *
OFFICE OF ATTORNEY GENERAL *
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JERE M.H. WILLIS, JR *
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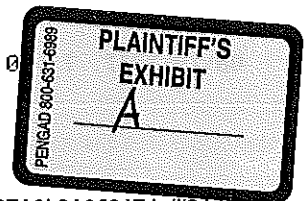
CYNTHIA L. McCOY *
109 NORTH EIGHTH STREET *
RICHMOND, VIRGINIA 23219 *

JUSTIN SHELTON *
109 NORTH EIGHTH STREET *
RICHMOND, VIRGINIA 23219 *

Defendant(s)

Complaint (Rev. 12/2000)

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COMPLAINT

1. Jurisdiction in this case is based on:

- Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- Federal question (suit is based upon a federal statute or provision of the United States Constitution)
- Other (explain) _____

The facts of this case are:

Count One: Fraud

On or about September 14th, 2010, and November 29th, 2010, Defendants' Justin Shelton and Cynthia L. McCoy, Clerks for the Virginia Court of Appeals, informed Plaintiff that his opening brief was not in compliance with the Rules of Court because, *inter alia*, the brief did not contain assignments of error. On or about December 2010, as instructed by the Clerks for the Virginia Court of Appeals, Plaintiff filed a written request to have the case dismissed.

Count Two: Slander

On or about February 15th, 2011, Plaintiff received a "Google Alert" showing that the Virginia Court of Appeals, conspired with Defendant Justia Inc., to place the Virginia Court of Appeals ruling of Plaintiff's appeal, onto Justia, Inc.'s, website, providing unsubstantiated opinions about Plaintiff's medical history. Plaintiff made an immediate request to Defendants, asking that Justia Inc. remove Virginia Court of Appeal's personal opinions regarding Plaintiff's medical information from Justia Inc.'s website, or post on Justia Inc.'s website, the histories of alleged abortions, H.I.V., Hepatitis, Human papillomavirus (HPV), Syphilis, Gonorrhea, Anal Warts, and other viral infections that Defendants McClanahan, Haley, Willis, McCoy, Shelton, and Justia Inc., have documented within their medical records, if any.

Count Three: Intentional Infliction of Emotional Distress

On March 9th, 2011, Plaintiff received a second "Google Alert" showing that Defendants modified the Virginia Court of Appeal's Internet posting to allow their personal opinion of Plaintiff's medical information, to be viewed on the Internet, by typing Plaintiff's first name, middle initial, and last name, at any Internet search engine. Defendants withheld medical opinions pertaining to Caucasians Defendants involved in the appeal, or issues pertaining to medical histories of alleged abortions and viral infections treated by Defendants' physicians, if any.

Count Four: Racial Discrimination

Based solely on Plaintiff's race (African-American), Defendants intentionally engaged in acts of judicial bullying, a high tech lynching, and abuse of authority, by conspiring with Defendant Justia Inc., to place their personal and unsubstantiated opinions specific to Plaintiff's medical information onto the Internet for public consumption, after rejecting Plaintiff's opening appeal brief and a follow-up request to dismiss the appeal. This malicious action was taken by Defendants in order to exclude OCR protocol, exclude sensitive medical histories of Liberty Mutual Insurance Company's Caucasian clients that were involved in Plaintiff's appeal, exclude the histories of alleged abortions and other viral diseases included within Defendants McClanahan, Haley, Willis, McCoy, Shelton, and Justia Inc.'s medical records, and exclude alleged financial contributions from Liberty Mutual Insurance Company to political organizations associated with Defendants McClanahan, Haley, and Willis. Between 2009-2010, Liberty Mutual Insurance Company provided over \$882,000.00 in financial contributions to political organizations opposing the idea of a government-provided health insurance options that will provide health

2. The relief I want the court to order is:

Damages: \$4,000,000.00

An injunction ordering: Defendants to remove all medical information posted to the Internet, specific to Virginia Court of Appeals Case No. 1561-10-4, and all other medical information associated with Plaintiff.

Other (explain) Plaintiff demands that Defendants create a website and post their medical information specific to later term abortions, H.I.V., Hepatitis, Human papillomavirus (HPV), Syphilis, Gonorrhea, Anal Warts, and other viral infections, if any.

March 11th, 2011

(Date)

(Signature)

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Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

Complaint (Rev. 12/2000)

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