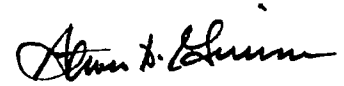


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HUTCHISON & STEFFEN
A PROFESSIONAL LLC

EXHIBIT A

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CLERK OF THE COURT

1 **COMP**
2 JONATHAN B. GOLDSMITH, ESQ.
3 Nevada Bar No. 11805
4 **ROSENFELD & RINATO**
5 9029 South Pecos Road, #2800
6 Henderson, Nevada 89074
7 702.386.8637 (phone)
8 702.385.3025 (fax)
9 jgoldsmith@lawrosen.com
10 In Proper Person

DISTRICT COURT
CLARK COUNTY, NEVADA

8 JONATHAN B. GOLDSMITH, ESQ., an
9 Individual

CASE NO. A - 1 0 - 6 2 6 7 2 8 - C

10 Plaintiff,

DEPT. NO. X V I I

11 vs.

**EXEMPT FROM ARBITRATION:
Action for Extraordinary Relief**

12 JORDAN R. COOPER, an Individual;
13 CHERYL COOPER DRISCOLL, an
14 Individual; FACEBOOK, INC.; a Foreign
15 Corporation; DOES 1 through 5 and ROE
16 CORPORATIONS 1 through 5, inclusive,

15 Defendants.

16 **COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

17 COMES NOW, Plaintiff, JONATHAN B. GOLDSMITH, ESQ. (hereinafter "Plaintiff"), in
18 Proper Person, and for his Complaint for Damages and Injunctive Relief against Defendant JORDAN
19 R. COOPER (hereinafter "Cooper"), Defendant CHERYL COOPER DRISCOLL (hereinafter "Cooper
20 Driscoll"), and Defendant FACEBOOK, INC. (hereinafter "Facebook") alleges the following.

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GENERAL ALLEGATIONS

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1. Plaintiff JONATHAN B. GOLDSMITH, ESQ., a member of the State Bar of Nevada, is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
2. Upon information and belief, Defendant JORDAN R. COOPER is, and has been for a period of more than six months prior to the filing of this action, a resident of the State of Nevada, County of Clark.
3. Upon information and belief, Defendant CHERYL COOPER DRISCOLL is a resident of the State of Arizona, and has, by means of the Internet, participated and conducted tortious acts across state lines in the State of Nevada and all states with access to the Internet.
4. Upon information and belief, Defendant FACEBOOK, INC. is a foreign corporation licensed in the State of California and doing business primarily as an Internet social networking website with reach to all states with access to the Internet, including the State of Nevada.
5. Plaintiff is counsel of record in a domestic case in the Eighth Judicial District Court whereby Defendant Cooper is an opposing party.
6. Plaintiff has had no contact with Defendant Cooper or any Defendant except through his counsel of record in the aforementioned case.
7. Nevertheless, Defendants have consistently and continually committed defamation and privacy violations in addition to several other purposeful tortious acts against Plaintiff through the use of the world wide web and by other means.
8. Specifically, on or around October 1, 2010 at around 3:30 p.m., Defendant Cooper, by means of Defendant Facebook's internet social networking website, published defamatory and demeaning statements specifically directed at Plaintiff which stated: "im on to you jonathan golddick(smith) ha faggot" and further stated "he looks like a pediphile (sic)."
9. Further, Defendants published the statement of a Facebook user which stated: "ha I want to se (sic) what that douche bag looks like."

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- 1 10. Moreover, on or around October 2, 2010 at around 6:10 p.m., Defendant Cooper Driscoll, by
2 means of illegal and tortious invasion of privacy, stole a private photograph depicting the likeness
3 of Plaintiff, and, by means of Defendant Facebook's internet social networking website,
4 published the stolen picture on Defendant Cooper's internet page, which is managed and
5 maintained by Defendant Facebook.
- 6 11. Defendants Cooper and Cooper Driscoll made disparaging remarks about the stolen photograph,
7 and Defendant Cooper Driscoll acknowledged that Defendants had committed unlawful and
8 tortious behavior by posting the following statement: "delete that picture already."
- 9 12. Defendant Cooper, by means of Defendant Facebook, published statements about Plaintiff,
10 including that Plaintiff is a "faggot" and a "pedophile" which constitute slander per se.
- 11 13. Defendant Cooper Driscoll, by means of Defendant Facebook, caused to be published a personal
12 and private photograph depicting the name, image and likeness of Plaintiff along with
13 disparaging statements coinciding with the stolen picture.
- 14 14. With regard to all allegations related to torts committed against Plaintiff over the internet,
15 Defendant Facebook facilitated, published or neglected to mitigate the defamatory and harassing
16 statements and comments published by Defendant Cooper and Defendant Cooper Driscoll.
- 17 15. Plaintiff, who is an attorney in the State of Nevada runs an operates a law firm in the State.
- 18 16. Much of Plaintiff's business is dependant on the public's view of Plaintiff's moral character,
19 reliability and reputation.
- 20 17. Defendants' actions have already, and will likely continue to demean and diminish Plaintiff's
21 reputation in the legal community as well as with Plaintiff's personal social community.
- 22 18. Plaintiff uses Defendant Facebook's marketing and advertising programs to advertise and market
23 Plaintiff's business.
- 24 19. As a result of Defendant's actions, Plaintiff has been forced to cease all advertising and
25 marketing through Defendant Facebook given that a diminishment of Plaintiff's reputation is
26 taking place through Defendant Facebook as a result of Defendant Cooper and Defendant Cooper
27 Driscoll's actions.
- 28 20. Plaintiff has suffered extreme emotional distress as a result of Defendant's actions.

- 1 21. Defendant Cooper has engaged in a pattern of stalking against Plaintiff.
- 2 22. Most notably, in around August, 2010, Plaintiff observed Defendant's yellow Ford mustang with
- 3 black stripes, with the license plate "Sage 3", parked outside of Plaintiff's law office located at
- 4 1212 South Casino Center Boulevard in Las Vegas, Nevada.
- 5 23. Additionally, after Plaintiff moved offices, Defendant Cooper has driven by and appeared several
- 6 times at Plaintiff's new office located in Henderson, Nevada while driving a red Ford Mustang.
- 7 24. Defendant Cooper Driscoll has also engaged in a pattern of stalking against Plaintiff.
- 8 25. Specifically, Defendant Cooper Driscoll created a false profile on Defendant Facebook's website
- 9 using a false name and false picture, in order to gain access to Plaintiff's personal and private
- 10 information.

FIRST CAUSE OF ACTION

(Slander against all Defendants)

- 13 26. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs
- 14 although fully incorporated herein. Plaintiff further alleges:
- 15 27. Defendants made a false and defamatory oral communication concerning Plaintiff.
- 16 28. Defendants' communication was published to a third party.
- 17 29. Defendants knew or should have known the communication was false and that it defamed
- 18 Plaintiff.
- 19 30. Defendants' publication of the communication was a legal cause of special damages to the
- 20 plaintiff.
- 21 31. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of
- 22 \$10,000.00.
- 23 32. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and,
- 24 therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 25 33. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these
- 26 claims and is entitled to any and all costs incurred herein, including, without limitation, any and
- 27 all attorneys' fees.
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SECOND CAUSE OF ACTION

(Slander Per Se against all Defendants)

- 34. Plaintiff repeats and realleges each and every allegation made in the preceding paragraph although fully incorporated herein. Plaintiff further alleges:
- 35. Defendants made a false and defamatory oral communication concerning Plaintiff.
- 36. Defendants' communication was published to a third party.
- 37. Defendants knew or should have known the communication was false and defamatory to Plaintiff.
- 38. Defendants communication imputes to Plaintiff the commission of a crime and tends to injure Plaintiff in his trade, profession, business and office
- 39. As result of Defendants' actions, Plaintiff has been damaged in an amount to be ascertained by the court, but not less than \$10,000.00.
- 40. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 41. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

THIRD CAUSE OF ACTION

(Libel against all Defendants)

- 42. Plaintiff repeats and realleges each and every allegation made in the preceding paragraph although fully incorporated herein. Plaintiff further alleges:
- 43. Defendants made a false and defamatory written communication concerning Plaintiff.
- 44. Defendants' communication was published to a third party.

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45. Defendants knew or should have known the communication was false and that it defamed Plaintiff.

46. Defendants' publication of the communication was a legal cause of special damages to the plaintiff.

47. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

48. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

49. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

FOURTH CAUSE OF ACTION

(Libel Per Se against all Defendants)

50. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

51. Defendants made a false and defamatory written communication concerning Plaintiff.

52. Defendants' communication was published to a third party.

53. Defendants knew or should have known the communication was false and that it defamed Plaintiff.

54. Defendants communication imputes to Plaintiff the commission of a crime and would tend to injure Plaintiff in his trade, profession, business and office

55. As result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

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56. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

57. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

FIFTH CAUSE OF ACTION

(False Light Defamation against Defendant Cooper and Cooper Driscoll)

58. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

59. Defendants made a false and defamatory oral and written communication concerning Plaintiff.

60. Defendants' communication was published to a third party.

61. Defendants knew or should have known the communication was false and that it defamed Plaintiff.

62. Defendants' actions placed Plaintiff in a false light in a way that the general public would find highly offensive.

63. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

64. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

65. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

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SIXTH CAUSE OF ACTION

(Invasion of Privacy against Defendant Cooper and Cooper Driscoll)

- 66. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
- 67. Defendants intentionally and maliciously intruded into Plaintiff's private affairs.
- 68. Defendants' intrusion would be found highly offensive to the general public.
- 69. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
- 70. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 71. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

SEVENTH CAUSE OF ACTION

(Intentional Interference with Business Relations against Defendant Cooper and Cooper Driscoll)

- 72. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
- 73. Plaintiff conducts business as an Attorney in the State of Nevada.
- 74. Plaintiff previously held contracts with Defendant Facebook for marketing and advertising over the Internet.
- 75. Defendant Cooper and Cooper Driscoll knew or should have known of the existence of Plaintiff's business in the state of Nevada and the advertising and marketing contracts with Defendant Facebook.

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76. Defendants intentionally made false claims about Plaintiff with the intent to drive business away and induce the interference with Plaintiff's contracts.

77. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

78. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

79. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

EIGHTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress against Defendant Cooper and Cooper Driscoll)

80. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:

81. Defendants engaged in outrageous conduct wilfully and maliciously directed at Plaintiff with the intent to cause emotional distress.

82. Plaintiff suffered extreme emotional distress as a result of Defendants' intentional actions.

83. Defendants' actions were the proximate cause of Plaintiff's extreme emotional distress.

84. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

85. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

86. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

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NINTH CAUSE OF ACTION

(Stalking against Defendant Cooper and Cooper Driscoll)

- 87. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
- 88. Defendant Cooper, without lawful authority, willfully or maliciously engages in a course of conduct that would cause a reasonable person to feel terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member.
- 89. Defendants' actions caused Plaintiff to feel terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member.
- 90. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.
- 91. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.
- 92. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

TENTH CAUSE OF ACTION

(Violation of U.S.C. 18 § 2511(a) against Defendant Cooper and Cooper Driscoll)

- 93. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs although fully incorporated herein. Plaintiff further alleges:
- 94. Defendants intentionally intercepted or endeavored to intercept , an electronic communication that was of private nature to Plaintiff.
- 95. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

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96. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

97. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

ELEVENTH CAUSE OF ACTION

(Violation of U.S.C. 18 § 2511(e) against Defendant Cooper and Cooper District)

98. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs, although fully incorporated herein. Plaintiff further alleges:

99. Defendants intentionally disclosed communications unlawfully obtained in violation of U.S.C. 18 § 2511(a).

100. As a result of Defendants' actions, Plaintiff has been damaged in an amount in excess of \$10,000.00.

101. Defendants' actions constitute acts of conscious disregard, fraud, malice or oppression, and, therefore, Plaintiff is entitled to exemplary or punitive damages as a result.

102. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

TWELFTH CAUSE OF ACTION

(Permanent Injunction against Defendant Cooper and Cooper District)

103. Plaintiff repeats and realleges each and every allegation made in the preceding paragraphs, although fully incorporated herein. Plaintiff further alleges:

104. Defendants have in the past, and are likely to continue in the future, to cause serious irreparable harm to Plaintiff.

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105. Plaintiff is entitled to a permanent injunction against Defendants' use of Plaintiffs' name and likeness in connection with false and/or misleading communications.

106. Plaintiff is additionally entitled to a permanent injunction against Defendants' actions that constitute stalking and harassment.

107. It has become necessary for the Plaintiff to retain the services of counsel to prosecute these claims and is entitled to any and all costs incurred herein, including, without limitation, any and all attorneys' fees.

WHEREFORE, Plaintiff is entitled to judgment as follows:

1. For damages in excess of \$10,000.00 against each Defendant for each cause of action as alleged in the Complaint;
2. For exemplary or punitive damages against each Defendant for each cause of action as alleged in the Complaint;
3. For reasonable attorney's fees and costs;
4. For a permanent injunction against each Defendant as alleged in the Complaint; and
5. For any other relief that the Court may deem just and proper.

DATED this 5th day of October, 2010.

/s/ Jonathan B. Goldsmith, Esq.

JONATHAN B. GOLDSMITH, ESQ.
Nevada Bar No. 11805
ROSENFELD & RINATO
9029 South Pecos Road, #2800
Henderson, Nevada 89074
702.386.8637 (phone)
702.385.3025 (fax)

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VERIFICATION

State of Nevada)
) ss:
County of Clark)

I, Jonathan B. Goldsmith, Esq., under the penalty of perjury, do hereby swear and affirm that all allegations contained in Plaintiff's Complaint are made from fact and personal knowledge, unless made by information and belief, in which case are stated to be made by information and belief.

Dated this 5th day of October, 2010

/s/ Jonathan B. Goldsmith, Esq.
JONATHAN B. GOLDSMITH, ESQ.

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EXHIBIT B

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REGISTER OF ACTIONS
CASE NO. A-10-626728-C

Jonathan Goldsmith, Plaintiff(s) vs. Jordan Cooper, Defendant(s)

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§Case Type: **Intentional Misconduct**Subtype: **Torts/Defamation**Date Filed: **10/04/2010**Location: **Department 17**Conversion Case Number: **A626728**

PARTY INFORMATION

Defendant	Cooper, Jordan R.	Lead Attorneys
Defendant	Driscoll, Cheryl Cooper	
Defendant	Facebook Inc	
Plaintiff	Goldsmith, Jonathan B.	Jonathan B Goldsmith, ESQ
		<i>Retained</i>
		702-448-7981(W)

EVENTS & ORDERS OF THE COURT

	OTHER EVENTS AND HEARINGS
10/04/2010	Case Opened
10/04/2010	Complaint <i>Complaint for Damages and Injunctive Relief</i>
10/05/2010	Motion for Preliminary Injunction <i>Ex Parte Motion for Preliminary Injunction</i>
10/07/2010	Order Shortening Time <i>Application for an Order Shortening Time and Order</i>
10/18/2010	Certificate of Service <i>Certificate of Service</i>
10/25/2010	Motion for Preliminary Injunction (8:30 AM) (Judicial Officer Villani, Michael) <i>Ex Parte Motion for Preliminary Injunction</i> <i>11/08/2010 Reset by Court to 10/25/2010</i>

FINANCIAL INFORMATION

	Plaintiff Goldsmith, Jonathan B.		
	Total Financial Assessment		270.00
	Total Payments and Credits		270.00
	Balance Due as of 10/20/2010		0.00
10/05/2010	Transaction Assessment		270.00
10/05/2010	Wiznet Receipt # 2010-51965-CCCLK	Goldsmith, Jonathan B.	(270.00)

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HUTCHISON & STEFFEN

A PROFESSIONAL LLC

EXHIBIT C

**AFFIDAVIT OF CHRISTIAN M. ORME
IN SUPPORT OF PETITION FOR REMOVAL OF CIVIL ACTION**

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

Christian M. Orme, Esq., being first duly sworn, deposes and says that:

1. I am an attorney licensed and duly practicing law in the State of Nevada and an associate at Hutchison & Steffen, LLC. In that capacity, my law firm represents Facebook, Inc. (hereinafter “Facebook” and/or “Defendant”). I prepared and read Facebook’s Petition for Removal of Civil Action and know the matters set forth to be true and correct to the best of my knowledge and belief. I make this affidavit in support of the same.

2. Plaintiff Jonathan B. Goldsmith (“Plaintiff”) brought this action in the District Court of Nevada, Clark County, entitled *Jonathan B. Goldsmith v. Jordan R. Cooper, Cheryl Cooper Driscoll, and Facebook, Inc.*, Case No. A-10-626728-C. The action was assigned to Department VXII of that Court. Defendant has not been properly served with a copy of the Complaint. This is the first paper received for which it could use to ascertain removability.

3. Goldsmith alleges that Defendants Cooper and Cooper Driscoll posted “defamatory and harassing statements and comments” on Facebook. Based on this, Goldsmith concludes that “Facebook facilitated, published or neglected to mitigate the defamatory or harassing statements and comments published by Defendant Cooper and Defendant Cooper Driscoll” (Compl., ¶ 14) and that Facebook is liable for slander and libel. Compl., ¶¶ 26-57. The Complaint does not allege that Facebook created or otherwise assisted in the creation of the “statements and comments.”

4. The Communications Decency Act, 47 U.S.C. § 230 (“CDA”) states that “[n]o

1 provider or user of an interactive computer service shall be treated as the publisher or speaker
2 of any information provided by another information content provider.” 42 U.S.C. § 230(c)(1).
3
4 The statute explicitly immunizes covered individuals and entities against state tort claims by
5 mandating that “[n]o cause of action may be brought and no liability may be imposed under any
6 State or local law that is inconsistent with this section.” 47 U.S.C. § 230(e)(3). Liability for
7 state tort claims simply cannot be imposed unless the defendant is an “information content
8 provider,” defined as “any person or entity that is responsible, in whole or in part, for the
9 creation or development of information provided through the Internet.” 47 U.S.C. § 230(f)(3).
10

11 5. This action is a civil action of which this Court has original jurisdiction under
12 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendants pursuant to 28
13 U.S.C. § 1441(b) in that it arises under provisions of 18 U.S.C. §§ 2511.

14 6. To the extent the other claims alleged by Plaintiff do not relate to the CDA, they
15 are “separate and independent” claims, such that the removal of this entire dispute is proper
16 pursuant to 28 U.S.C. § 1441(c). *See generally Risetto v. Plumbers & Steamfitters Local 343*,
17 94 F.3d 597, 600n.2 (9th Cir. 1996) (holding the district court possessed supplemental
18 jurisdiction over other state law claims because the action was properly removable in light of
19 the preemption of the breach of contract and breach of the implied covenant claims).
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22 7. Defendant may remove this action to this Court pursuant to the provisions of 28
23 U.S.C. § 1441(b) without regard to the amount in controversy or citizenship of the parties.

24 8. This Court may exercise supplemental jurisdiction, pursuant to 28 U.S.C. §
25 1367, over the remaining state law claims in Goldsmith’s Complaint because such claims form
26 part of the same alleged case or controversy as the claims based upon federal law.
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9. This notice of removal is timely because Defendant has not been properly served. Nevertheless, Defendant is filing this notice of removal within thirty days of the filing of the Complaint on or about October 4, 2010.

10. Facebook is not the only defendant in this case. Defendants Jordan Cooper and Cheryl Cooper Driscoll have agreed to join in this removal. Thus, there is complete joinder of defendants in this matter. Facebook has attached copies of the Complaint as **Exhibit A** and an index of the pleadings from the state court action as **Exhibit B**.

11. Facebook has concurrently filed a copy of this notice with the Eighth Judicial District Court.

12. Facebook has served upon Plaintiff a copy of this notice.

13. The Petition for Removal of Civil Action is signed pursuant to Rule 11 of the Federal Rules of Civil Procedure.

14. Affiant caused to be served a copy of the Notice of Removal and Petition for Removal of Civil Action upon Plaintiff, by depositing it in the United States Mail, on October 21, 2010, in an envelope properly addressed to:

Jonathan B. Goldsmith, Esq. (11805)
Rosenfeld & Rinato
9029 South Pecos Road, #2800
Henderson, Nevada 89074

15. On October 21, 2010, I filed with the County Clerk of the Eighth Judicial District Court, in and for Clark County, Nevada a Notice of Removal, seeking removal of the above-mentioned action to the United States District Court, District of Nevada, together with a copy of the Petition for Removal of Civil Action and attached exhibits, by filing such copies with the County Clerk's Office

///

HUTCHISON & STEFFEN

A PROFESSIONAL LLC
PECCOLE PROFESSIONAL PARK
10080 WEST ALTA DRIVE, SUITE 200
LAS VEGAS, NV 89145

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Further, Affiant sayeth naught.

DATED this 21 day of October, 2010.


CHRISTIAN M. ORME

SUBSCRIBED and SWORN to before me
this 21st day of October, 2010.


Notary Public in and for
said County and State

