

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

COMPLAINT

DOE I, and DOE II,  
Plaintiffs,

v.

Case No.

307CV00909

CFD

Anthony Ciolli; Individuals, whose true names are unknown, using the following pseudonyms: Pauliewalnuts; neoprag; STANFORDtroll; :D; :D (Hillary vs. Jeb '08); MoreDoughHi; Remember when I said I would kill you last? I lied.; lkjhgf; yalelaw; Spanky; ylsdooder; Community Norm; HI; David Carr (Glass of water for Mr. Grainger); vincimus; Beach Body Brady; Cheese Eating Surrender Monkey; Todd Christopher; A horse walks into a bar (saving one CPGWBT at a time); The Ayatollah of Rock-n-Rollah; DRACULA; Sleazy Z; Whamo (Let me lay it on the line, he had two on the vine); Ari Gold; Ugly Women; playboytroll; Get\_to\_da\_choppa; Dean\_Harold\_Koh,

Defendants.

A. INTRODUCTION

Two women who have done nothing except work hard in school and show promise of making contributions to society have been targeted because of their appearance and out of spite to be the subject of a campaign of pornographic abuse. Hiding behind pseudonyms and the smug assumption that their carefully-aimed hostility can pass as merely juvenile misconduct, the defendants have worked assiduously to harm the plaintiffs, for the sheer joy of destruction. Plaintiffs, whose character, intelligence, appearance and sexual lives have been thoroughly trashed by the defendants, now seek redress by bringing this action for damages and injunctive relief.

## **B. PARTIES**

1. Plaintiff Doe I is, and at all times relevant was, a citizen of Connecticut residing in New Haven.

2. Plaintiff Doe II is, and at all times relevant was, a citizen of Connecticut residing in New Haven.

3. On information and belief, Defendant Anthony Ciolli is and at all relevant times was a citizen of Pennsylvania, residing at 4020 Spruce Street, Philadelphia, Pennsylvania, 19104.

4. The citizenship and addresses of the remaining Defendants are currently unknown.

## **C. JURISDICTION**

5. The jurisdiction of this court is invoked pursuant to 28 U.S.C. § 1331. This action arises under the Copyright Act, 17 U.S.C. § 501, *et seq.*

## **D. NATURE OF THE CASE**

6. Plaintiffs Doe I and Doe II are students at Yale Law School. Doe I enrolled in the fall of 2005, Doe II in the fall of 2006.

7. Through no action or fault of their own, plaintiffs have been the targets of defamatory, harassing and threatening statements made by pseudonymous posters to an Internet discussion board, AutoAdmit. As a result of these personal attacks and threats, Doe I and Doe II have suffered substantial psychological and economic injury.

### **1. AutoAdmit**

8. AutoAdmit is, and at all relevant times was, an Internet discussion board on which participants can post comments and information about undergraduate colleges, graduate schools, and law schools. The law school portion of AutoAdmit describes itself on its website, located at [http://www.autoadmit.com/?forum\\_id=2](http://www.autoadmit.com/?forum_id=2), as “[t]he most prestigious law school admissions discussion board in the world.”

9. AutoAdmit also has a “mirror site” at [xoxoth.com](http://xoxoth.com). In general, mirror sites contain the same or almost the same content as the original site. Mirror sites exist to provide a

back-up to the original site, *i.e.*, to ensure there is another site available to download content. In the case of AutoAdmit, many of the messages and information that can be found at autoadmit.com can also be located at xoxohth.com.

10. Individuals who register with the AutoAdmit website may post messages to the site's various discussion boards. Anyone who uses the Internet and goes to the AutoAdmit site, either directly or via an Internet search engine such as Google, may view the messages posted to the discussion board. Only registered AutoAdmit users, however, may post new messages and respond to the messages of other registered users.

11. After a participant posts a new message, any further comments or responses to the subject area of that message are collected as a "thread." Message threads can be quite lengthy depending on the level of interest in a particular subject. Some message threads, including several threatening Doe I or Doe II, contain over one thousand individual posts.

12. Individuals who register with the AutoAdmit site are not required to provide their real names. The information required to register with AutoAdmit includes, in pertinent part: desired login name, password, and a valid email address.

13. Because the site does not require posters to register with their real names, the majority of posters use pseudonyms or "user names"; for example, "Paulie Walnuts," "neoprag," and "YLS Yale." Similarly, posters can also impersonate others by adopting the names of those individuals as their user names. Posters can also adopt multiple user names and, if they so desire, attempt to maintain several identities simultaneously on the AutoAdmit website.

14. On information and belief, at the time that the persons posting messages about Doe I and Doe II made their comments, they were aware that both plaintiffs were students at Yale Law School or would soon enroll at Yale Law School, and that their comments would injure Doe I and Doe II while they were students at Yale Law School.

15. On information and belief, at the time that the persons posting messages about Doe I and Doe II made their comments, some of the persons posting messages about Doe I and Doe II were residents of Connecticut or could be found in Connecticut.

16. The AutoAdmit website has been managed by Jarrett Cohen and Anthony Ciolli. The site was started in 2004, and according to Cohen and Ciolli, draws between 800,000 and one million visitors a month. They also claim that the popularity of the AutoAdmit site is due to their policy of allowing any and all comments, including many inappropriate and offensive posts, to remain on the site.

17. Neither Cohen nor Ciolli has ever attempted to remove any harassing, offensive, or threatening threads about plaintiffs Doe I and Doe II. They were fully aware that the posts about Doe I and Doe II were causing injury, but still refused to take any steps to improve the situation.

18. On information and belief, Anthony Ciolli resigned as “Chief Education Director” of AutoAdmit in April of 2007.

19. On information and belief, Jarret Cohen continues to administer the AutoAdmit site.

20. Cohen (and Ciolli prior to his resignation), as the site’s administrator, has the ability and authority to remove any thread or any post upon receiving an individual’s request. For example, Cohen and Ciolli imposed an “anti-outing” policy whereby any posts regarding the actual, “off-line” identity of participants in AutoAdmit are deleted. At the same time, they have repeatedly ignored Doe II’s and Doe I’s request to delete the harassing, offensive, and threatening posts aimed at the plaintiffs.

21. Cohen and Ciolli have profited from AutoAdmit by hosting advertisements on their website through an arrangement with a third party (Google AdSense). In general, the greater the number of visitors to a given website, the greater the amount of advertising revenue will be generated. On information and belief, Cohen and Ciolli personally profited by the increased traffic caused by the defendants’ harassing, offensive, and threatening posts aimed at Doe I or Doe II.

22. The threads on the AutoAdmit site can be found through search engines such as the one operated by Google. By entering a person’s name as a search term, the engine will list

various threads in which that name appears as search results.

23. AutoAdmit participants are aware that the threads on which their comments are included can be easily found through search engines such as Google. One type of harassment engaged in by AutoAdmit posters is called “google-bombing.” When these posters “google-bomb” an individual, they take steps to have threads containing defamatory or harassing statements appear as one of the first search results returned by Google.

24. As of June 6, 2007, the top four search results for “[Doe II]” on Google were xoxo Reader and AutoAdmit.com postings. The third search result is titled: “AutoAdmit.com – [Doe II] of YLS has huge fake titties,” and the fourth search result is titled: “AutoAdmit.com - YLS 1L [DOE II] HAS HUGE FAKE TITS AND IS ...” When an internet users clicks on the fourth search result, he or she sees the entire title of the thread: “YLS 1L [DOE II] HAS HUGE FAKE TITS AND IS UNIVERSALLY HATED.”

## 2. Doe I

25. After plaintiff Doe I’s graduation from Stanford University in the summer of 2004, she applied for admission to Yale Law School and was admitted to join the school’s class of 2008.

26. In the summer of 2005, shortly before she had planned to move to New Haven and begin her legal education, Doe I learned from an acquaintance that she was the subject of a message thread on AutoAdmit. Until then, Doe I was entirely unaware of the site’s existence, let alone her vulnerability to anonymous threats and harassment. This first thread was begun by a poster using the pseudonym, “STANFORDtroll.” That person specifically addressed Doe I’s future classmates, telling them to “watch out for her” when she would begin at Yale Law School in the fall.

27. The message thread, entitled “Stupid Bitch to Attend Yale Law,” contains numerous threats, usually of a sexual nature, and false claims about Doe I including:

- “i’ll force myself on her, most definitely.” (posted under the user name, “neoprag”)
- “I think I will sodomize her. Repeatedly.” (posted by “neoprag”)

- “just don’t FUCK her, she has herpes” (posted by “:D”)

28. After discovering these extensive harassing comments about her on the AutoAdmit site, Doe I sent e-mail messages to both Ciolli and Cohen requesting that this thread be removed from AutoAdmit. She received a response in January of 2007, telling her that the posts would not be taken down.

29. On information and belief, these, and other, statements posted by pseudonymous individuals on AutoAdmit impaired Doe I’s ability to obtain summer employment after her second year at Yale. Summer job interviews that take place during the beginning of the second year and are an important opportunity to secure a summer associate position. A summer associate position between the second and third years of law school is a lucrative job, and more importantly, often leads to a permanent position.

30. To obtain a summer associate position, Doe I participated in approximately sixteen on-campus interviews at Yale, and four “call-back” interviews with law firms at their offices, but she did not receive any job offers through Yale’s on-campus interviewing process.

31. On information and belief, it is unprecedented for a second year law student from Yale to participate in so many interviews without obtaining a single summer associate offer.

32. At the time of her search for summer associate positions, Doe I’s academic qualifications were similar to those of her classmates who found positions through the on-campus interview program.

33. On information and belief, Doe I was not offered a summer associate position from any of the firms that she interviewed with during the on-campus interview period because of the harassing, offensive, and false statements posted by defendants.

34. Doe I’s inability to obtain a summer associate position through Yale Law School’s on-campus interview program made it necessary for her to take time away from studying law and working as a student director of the Orville H. Schell, Jr. Center for International Human Rights at Yale Law School in order to find summer employment outside the usual channels.

35. Subsequently, additional message threads about Doe I appeared, often containing falsehoods, attacks on her reputation, false claims, harassing comments, and physical threats.

36. The poster using the name “STANFORDtroll” again attacked Doe I’s reputation, with the express intent of damaging her future employment prospects, by starting a thread called “[Doe II] of Yale Law got a 159 on the LSAT”. STANFORDtroll falsely claimed that Doe I received a lower-than-expected LSAT score for a Yale Law student and, referring to the widely-cited list of “top” law firms compiled by Vault, goaded other posters to “[m]ake sure all the Vault 50s know it before she gets an offer.”

37. These lies about Doe I’s supposed LSAT score were amplified and repeated in later threads. A poster named “MoreDoughHi” later started another thread called “[Doe I]: Your rejects [ ]were your 159 LSAT, not XOXO.” Another user later further perpetuated this lie:

**Date:** March 8th, 2007 10:54 AM

**Author:** Remember when I said I would kill you last? I lied

This is absolutely, 100% credited. The assumption in the media that [Doe I’s] rejections were based on a post on some website that no lawyer takes seriously is laughable.

In another thread entitled “way more to this yale 2L story, but what?,” various posters suggested that Doe I had bribed officials at Yale Law School to gain admission, “I’m not sure why buying your way into Yale Law would make the school look bad (unless she paid an embarrassingly low amount to get in.)” (posted by “lkjhgf”), sexually assaulted her co-plaintiff, [Doe II], and engaged in a lesbian affair with the Dean of Admissions of Yale Law School:

**Date:** March 9th, 2007 9:04 PM

**Author:** yalelaw

The backstory is that [Doe I] has been having a lesbian affair with Yale Law School Admissions Dean Asha Rangappa while Rangappa has been on maternity leave. Rangappa’s husband found out about this and went ballistic. He contacted [Doe I’s] prospective employers in an effort to discredit her.

38. Other threads contain blunt threats of a sexual nature, and have caused Doe I emotional distress, as well as casting a further shadow on her reputation. For example, one pseudonymous poster named “Spanky” said, “[c]learly she deserves to be raped so that her little

fantasy world can be shattered by real life.” Another pseudonymous poster using the name “ylsdooder” made a similar sexual threat against Doe I, “i would like to hate-fuck [Doe I] but since people say she has herpes that might be a bad idea,” on a thread entitled “Which female YLS students would you sodomize?” And yet another poster, “Community Norm,” submitted the following comment on a thread entitled: “Salon.com article on xo / Doe I / Doe II.”

**Date:** March 9th, 2007 2:47 PM

**Author:** Community Norm

**Subject:** running those statements through the derapifier:

I would very much like to enjoy consensual sexual contact with that young woman, after a requisite period of courtship of course, and if necessary, wait till our union has been blessed by an appropriate clergyman. But once on our honeymoon, I would very much hope that she would grant me the boon of anal intercourse to the point of repeatedly climaxing inside.

39. This drumbeat of harassing comments posted about Doe I has injured her, resulting in significant emotional distress requiring visits to a counselor at the student health center at Yale. Additionally, the constant harassment during her second year of law school led to insomnia and distracted Doe I from her studies. Because of stress, Doe I is considering taking a semester off from school and received an incomplete in one of her classes. Last, the threatening posts required Doe I to alter her travel plans, incurring substantial additional expense. Due to meetings with law enforcement related to these events, Doe I missed a flight she was taking out of the country and was forced to leave four days later than she had planned, incurring significant expense in her attempts to rebook the flight.

### 3. Doe II

#### a. Initial harassment of Doe II

40. In early February 2007, Doe II was told by one of her friends that she was the subject of a thread on the AutoAdmit site, a website that she had never visited and on which she had never posted a single message and which she had in fact never visited. On the AutoAdmit site, Doe II found the first of many message threads about her, most of which consisted of attacks on her personality and her reputation, as well as containing many sexual and vulgar comments about her.

41. The original thread: "Rate this HUGE breasted cheerful big tit girl from YLS," was begun by a poster operating under the name "HI" on January 31, 2007. "HI" began the thread by listing several links to photographs of Doe II on an internet social networking website and invited a crude free-for-all of comments about her. That thread contained many vulgar comments about Doe II, including many sexual comments that any reasonable person would find extremely offensive and threatening, including the following:

**Date:** January 31st, 2007 9:40 PM

**Author:** HI

I'm trying to decide if I'd rather do her doggystyle or cowgirl. Cowgirl, the funbags would be in my face.

Doogystyle, they'd swing furiously as I pounded her from behind.

**Date:** January 31st, 2007 9:45 PM

**Author:** David Carr (*Glass of water for Mr. Grainger*)

cowgirl but honestly if you had a shot with her do it both ways

42. Outraged and upset by the thread, Doe II, like Doe I, wrote to the administrators of AutoAdmit multiple times through the contact information listed on the site, asking them to permanently remove the thread. In her requests, she told them explicitly of the harm she was experiencing because of the harassing, threatening, defamatory postings, including the fact that she had been forced to seek therapy. The only response that she received was a threat to post any future such requests on the AutoAdmit site.

43. Despite her attempts to end additional defamatory, harassing, and threatening posts about her, the outrageous behavior on AutoAdmit continued. The posters' fixation with Doe II went so far as to include suggestions to follow her to the gym and attempt to take her picture while in public:

**Date:** February 12th, 2007 11:29 AM

**Author:** vincimus

I can assure you she doesn't dress conservatively. Anyone who goes to the gym in the afternoon has seen her tramping around in spandex booty shorts and a strappy tank top. She wants people to look, and they do.

**Date:** February 12th, 2007 11:32 AM

**Author:** Beach Body Brady

**Date:** February 22nd, 2007 4:31 PM

**Author:** Cheese Eating Surrender Monkey  
Take your goddamned cell phone next time and snap a pic, for Chrissakes.

Then post, oc.

This invitation to stalk Doe II appears on a thread entitled “Huge Fucking Titties at Yale Law School (YLS) !!!!!!!!!!!!!!!.”

**b. The t14 site**

44. A few weeks later, various AutoAdmit posters jointly started a website devoted to “rating” female law students from schools around the country, “t14talent: The ‘Most Appealing Women @ Top Law Schools’”, located at t14talent.googlepages.com. (“T14” refers to some people’s idea of the country’s top 14 law schools.) The pseudonymous organizers of the t14 site accepted “nominations” for attractive women at these law schools over a period of time and solicited them from other participants at AutoAdmit. Once each of the top 14 law schools was “sufficiently represented,” according to the site, visitors to the website would vote on the most attractive woman at each school. Then, the site explained that the winners from each school would “go head to head as we determine the definitively hottest T14.” Without Doe II’s consent or permission, her photographs were copied and included in the t14 site’s “competition” for attractive female law students around the country.

45. A poster using the name “Pauliewalnuts” was one of the principal organizers of the t14 site, along with a poster operating under the pseudonym “Todd Christopher.”

46. As part of the “competition,” six photographs were used by “Pauliewalnuts” and the other organizers. Doe II owns the copyrights in five of those photographs and has registered those copyrights with the United States Copyright Office. The defendants involved in the formation of the t14 site copied those photographs without Doe II’s permission for their own use. “Pauliewalnuts” first posted the URL to the t14 webpage containing Doe II’s photographs on February 20, 2007, on a thread entitled “YLS 1L CGWBT.” (“CGWBT” is an acronym for “cheerful girl with big tits.”)

47. On the t14 site, pictures of Doe II were posted on webpages often containing

pornographic or otherwise unflattering advertisements. Doe II did not consent to use of her likeness on the competition's site, nor to its association with commercial advertising which she did not approve of or endorse.

48. Soon thereafter, threads began to appear on AutoAdmit regarding the t14 "contest" and crudely commenting on the individual women designated, including Doe II:

**Date:** February 21st, 2007 11:44 AM

**Author:** David Carr (*Glass of water for Mr. Grainger*)  
i want to titty fuck her for persian new year

**Date:** February 21st, 2007 11:47 AM

**Author:** A horse walks into a bar (*saving one CPGWBT at a time*)  
get in line

**Date:** February 21st, 2007 11:49 AM

**Author:** David Carr (*Glass of water for Mr. Grainger*)  
\*gets in line and waits patiently\*

**Date:** February 21st, 2007 11:48 AM

**Author:** Beach Body Brady  
I would pour syrup on that.

**Date:** February 21st, 2007 11:49 AM

**Author:** David Carr (*Glass of water for Mr. Grainger*)  
\*high five\*

**Date:** February 21st, 2007 11:49 AM

**Author:** A horse walks into a bar (*saving one CPGWBT at a time*)  
I would make a sundae including (but not limited to) whip cream,  
chocolate sauce, sprinkles,  
and a cherry.

**Date:** February 21st, 2007 11:51 AM

**Author:** David Carr (*Glass of water for Mr. Grainger*)  
i would just use cream and put my nuts on her chin

These comments and responses were only a small part of an extended conversation that took place under the title of "YLS 1L CGWBT."

**c. Continuing harassment of Doe II**

49. On information or belief, the t14 site was closed on approximately March 1, 2007, purportedly at the request of AutoAdmit. Since the closure of the t14 website, the harassment of

Doe II has continued unabated.

50. Other posters have indicated that their express desire was to harm Doe II's reputation and to cause her emotional distress. For example, on a thread bluntly titled, "Doe II, YLS 1L, you're a fucking cunt," one poster gleefully encouraged further attacks of Doe II and used anti-Semitic language to do so:

**Date:** March 4th, 2007 7:10 PM

**Author:** :D (*Hillary vs. Jeb '08*)

I'm doing cartwheels knowing this stupid Jew bitch is getting her self esteem raped.

51. Later that same day, the pseudonymous poster again attacked her on a separate thread, "you guys are assholes.":

**Date:** March 4th, 2007 8:34 PM

**Author:** :D (*Hillary vs. Jeb '08*)

They usually do. I deal with cheerful southern sororitutes and not NE jew bitches, though.

52. And, of course, a large number of comments made about Doe II consisted of sexual comments and attacks on her personal character, such as those on this thread entitled "whoever said [Doe II] is ugly with curly hair is dead WRONG!":

**Date:** March 4th, 2007 9:04 PM

**Author:** The Ayatollah of Rock-n-Rollah

Great pic. If I was a YLS student I would try to catch some of the residual effects of her whoring it up.

53. On March 4, 2007, a poster to AutoAdmit known by the pseudonym "Get\_to\_da\_choppa" posted the following message about Doe II: "Hey Doe II, YLS 1L, thanks for letting me double-team you."

54. On March 6, 2007, a poster to Autoadmit known by the pseudonym "Sleazy Z" posted the following message about Doe II: "How does Doe I like to be fucked?" Another pseudonymous poster, "Ari Gold," replied: "Each and every way. Ears, mouth, anus...you name it." And another poster using the name "DRACULA," chose to add: "By hundreds of people, but only if other family members are watching (preferably with bleacher-style seating)."

55. On March 6, 2007, a poster to AutoAdmit known by the pseudonym “Sleazy Z” posted the following message about Doe II: “Doe II is into scat. . . . At least that's what a buddy of mine that goes to YLS tells me.”

56. On April 10, 2007, a poster to AutoAdmit known by the pseudonym “Dean\_Harold\_Koh” posted the following message about Doe II: “[Doe II] the CGWBT sucked my cock for an P in Civ pro.”

57. On multiple occasions, AutoAdmit posters even attempted to start rumors that Doe I had died or committed suicide. The first such thread appeared on March 7, 2007, “[Doe II] found dead in apartment!,” and the second on April 6, 2007, “HOLY SHIT: [Doe II] dead; suicide suspected.”

58. On March 7, 2007, a poster to AutoAdmit using the pseudonym “Whamo” submitted the following message about Doe II on a thread entitled “Fun facts about [Doe II] – Yale Law ‘09”:

**Date:** March 7th, 2007 1:55 AM

**Author:** Whamo (*Let me lay it on the line, he had two on the vine*)

It's times like these I'm happy to have stumbled on PR so many years ago.

I wonder if her titties (along with all the slutting out she's been doing) are going to affect her back later in life? Hopefully it doesn't have an impact on her reverse cowgirl, which I have heard from several people is incredible. Until you get the clap.

59. On March 9, 2007, an AutoAdmit poster using the pseudonym “Ugly Women” posted the following message about Doe II: “[Doe II] (YLS 09) IS AN ANNOYING, SELFISH CUNT. I HOPE SHE GETS RAPED AND DIES.” This post is found within a thread entitled “is everything back to normal yet?”

60. On April 9, 2007 a poster to Autoadmit known by the pseudonym “playboytroll” posted the following message about Doe II: “stress from school? beautiful [Doe II] was featured in the PLAYBOY special!” The posting then listed this link to the Playboy website: [http://www.playboy.com/girls/celebrities/features/criesofpassion2/popup\\_frameset.html](http://www.playboy.com/girls/celebrities/features/criesofpassion2/popup_frameset.html). [“PSA: LISTEN TO CGWBT [DOE II’S] MESSAGE FOR YOU NOW”]

61. As a result of the numerous harassing comments posted about Doe II, she has suffered significant injury. The comments and messages about Doe II have caused her serious emotional distress distracting her from her schoolwork, resulting in insomnia, and requiring visits to a therapist. The harassment that Doe II has suffered also caused her to be physically ill, requiring a visit to Yale's health center. She has also considered taking a leave of absence from school and foregone educational opportunities that enrollment at Yale Law School would have otherwise afforded her, such as a potential leadership position in a student-run organization. Because of the defaming, threatening, and outrageous comments, Doe II was distracted from her school work to such an extent that she was not able to complete the semester on time and took incompletes in two of her classes. Doe II's relationship with her family has also suffered because of the extensive allegations about her sexual behavior.

#### **E. CAUSES OF ACTION**

##### **Claim I: Copyright Infringement, 17 U.S.C. § 501**

62. Doe I repeats and realleges each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

63. Plaintiff owns valid copyrights in her photographs and has registered these copyrights with the United States Copyright Office.

64. Defendants have, without plaintiff's authorization, copied the copyrighted photographs.

##### **Claim II: Appropriation of another's name or likeness**

65. Doe I and Doe II repeat and reallege each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

66. Defendants have appropriated for their own use or benefit plaintiffs' names and/or likeness without their authorization, consent or permission.

67. Plaintiffs have suffered injury as a result of defendants' acts of misappropriation.

##### **Claim III: Unreasonable publicity given to another's life**

68. Doe I and Doe II repeat and reallege each and every allegation set forth in the

preceding paragraphs of the Complaint as if fully set forth herein.

69. Defendants have publicly disclosed matters regarding plaintiffs that would be highly offensive to a reasonable person.

70. Those matters were not a matter of legitimate concern to the public.

71. Plaintiffs have suffered injury as a result of defendants' acts.

**Claim IV: Publicity that places another in a false light before the public**

72. Doe I and Doe II repeat and reallege each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

73. Defendants have placed plaintiffs in a false light which would be highly offensive to a reasonable person.

74. Defendants had knowledge of or acted in reckless disregard as to the falsity of the publicized matters and the false light in which plaintiffs would be placed.

75. Plaintiffs have suffered injury as a result of defendants' acts.

**Claim V: Intentional infliction of emotional distress**

76. Doe I and Doe II repeat and reallege each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

77. Defendants intended to inflict emotional distress or knew or should have known that emotional distress was the likely result of their conduct.

78. Defendants' conduct was extreme and outrageous.

79. Defendants' conduct was the cause of plaintiffs' emotional distress.

80. Plaintiffs' emotional distress, resulting from defendants' conduct, was severe.

81. Plaintiffs have suffered injury as a result of defendants' conduct.

**Claim VI: Negligent infliction of emotional distress**

82. Doe I and Doe II repeat and reallege each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

83. Defendants knew or should have known that their conduct involved an unreasonable risk of causing emotional distress.

84. Defendants knew or should have known that distress if it was caused might result in illness or bodily harm.

**Claim VII: Defamation**

85. Doe I and Doe II repeat and reallege each and every allegation set forth in the preceding paragraphs of the Complaint as if fully set forth herein.

86. Defendants published defamatory statements regarding plaintiffs.

87. The defamatory statements identified the plaintiffs to various third parties.

88. The defamatory statements were published to those third parties.

89. Plaintiffs have suffered injury as a result of the defamatory statements.

**F. REQUEST FOR RELIEF**

90. WHEREFORE, plaintiffs demand judgment against defendants as follows:


- i) For actual damages according to proof;
- ii) For special damages according to proof;
- iii) For punitive damages in the sum of \$245,400
- iv) For permanent removal of the message threads from the AutoAdmit Site;
- v) For authorization to Google permanently to remove the cached message threads;
- vi) For costs of suit and such other and further relief as the court deems just.

**G. JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all claims.

Dated: June 8, 2007

PLAINTIFFS DOE I AND  
DOE II

By:  \_\_\_\_\_

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