



1 3. Defendants Doe 1 through Doe 50, inclusive, are sued in this complaint under  
2 fictitious names. Their true names and capacities are unknown to plaintiff. When  
3 their true names and capacities are ascertained, plaintiff will amend this complaint  
4 by inserting their true names and capacities herein. (Plaintiff is informed and  
5 believes and thereon alleges, that each of the fictitiously named defendants is  
6 responsible in some manner for the occurrences alleged in this complaint, and  
7 that plaintiff's damages as alleged in this complaint were proximately caused by  
8 those defendants.  
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12 **FIRST CAUSE OF ACTION FOR INJUNCTIVE RELIEF**  
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15 4. On or about June 24, 2016 YOULANDA was informed that her disabled younger  
16 sister Lashonda Fox was a victim of an assault and battery and that the incident  
17 was still taking place on property of The Oak Grove High School. When running to  
18 aid her sister of what is evidently another form of aggression a homeless woman  
19 was about to engage in YOULANDA neutralized the aggression and avoided  
20 another serious attack from an unknown homeless lady who later was detained for  
21 mental observation.  
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24 5. At the scene the various spectators including the reputable Eric Zetterquist JV  
25 coach at Oak Grove High School witnessed the incident and made statements as  
26 to YOULANDA's innocence as follows " We will be sending no apologies to  
27 cracked out homeless ladies and if the media wants to cover it call my number we  
28 got nothing to hide". After it was more than evident the innocence of YOULANDA

1 the same contacted defendant FACEBOOK to inform them of the defamation and  
2 injury a video poses to her image and in actuality it depicts YOULANDA as an  
3 aggressor and a violent person when in reality she is a reputable person from the  
4 society who works with children and spends most of her time in helping others and  
5 working with various families and children. YOULANDA has no record of violence  
6 nor is she a violent person and acted only on behalf of the kids and her families  
7 safety.  
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10 6. Petitioner sent various requests to have the content removed due to the serious  
11 nature of defamation that was being spread by facebook's servers of an innocent  
12 bystander.  
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14 7. YOULANDA believes in the freedom of speech and does not challenge the right  
15 to post items on Facebook, or any other social media site, however YOULANDA  
16 does have a right to protect her integrity and her image and in doing so was  
17 denied the removal of a video depicting an act of self defense  
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20 8. Petitioner has no adequate remedy at law for the injuries threatened as an  
21 award of monetary damages would not provide an adequate remedy as the  
22 harm that will be suffered by the plaintiff cannot be readily calculated, as it  
23 includes not only diminishment of property use, but loss of enjoyment of the home,  
24 invasion of privacy and other civil and penal violation. Inclusive loss of tangible  
25 benefits.  
26

27 9. The continued publication of libellous material would cause irreparable harm to  
28 YOULANDA's] reputation, and [the] prohibited material has already been found to

1 constitute libel. We find that the balance of convenience favours the granting of  
2 an injunction because the terms of the proposed injunction would not prevent any  
3 of the defendants from engaging in political comment that was not defamatory,  
4 whereas the harm to [the respondent's] reputation would be substantial. Based on  
5 the fact that the statements which were defamatory of YOULANDA, that they did  
6 so maliciously, and that they have refused to take down the published material.  
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10 **WHEREFORE**, plaintiff prays judgment against defendants, and each of them, as  
11 follows:

12 1. For an order requiring defendants to show cause, if any they have, why they should  
13 not be enjoined as set forth in this complaint, during the pendency of this action;

14  
15 2. For a preliminary injunction, and a permanent injunction, all enjoining defendants,  
16 and each of them, and their agents, servants, and employees, and all persons acting  
17 under, in concert with, or for them:

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20 1. *From attempting to unlawfully defame or allowing to exist defamatory material  
21 on its servers by its negligent and harmful users.*

22 2. *To cease from publishing or allowing to be published Libel material that harms  
23 the image and the reputation of YOULANDA*

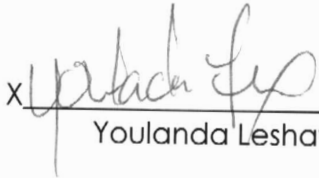
24 3. For damages in the sum of \$1,280 per day from June 24, 2016 to the date of  
25 injunction, plus damages in such further sums as may be sustained and as are  
26 ascertained before final judgment in this action;

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28 4. For costs of suit incurred in this action; and

1 5. For such other and further relief as the court deems proper.

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DATED: 7/1/2016

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Youlanda Leshay Fox

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State bar number, and address):  
**Youlanda Leshay Fox**  
 5615 Bodie Court  
 San Jose, CA 95123

TELEPHONE NO.: (408) 449-0397 FAX NO.:  
 ATTORNEY FOR (Name): **In Pro Per**

FOR COURT USE ONLY

**FILED**

JUL - 6 2016

DAVID H. YAMASAKI  
 Chief Executive Officer/Clerk  
 Superior Court of CA County of Santa Clara  
 DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF **Santa Clara**  
 STREET ADDRESS: 191 N. First Street  
 MAILING ADDRESS: 191 N First Street  
 CITY AND ZIP CODE: San Jose, CA 95113  
 BRANCH NAME: Unlimited Jurisdiction Civil Division

CASE NAME:  
**Fox vs. Facebook Inc.,**

**CIVIL CASE COVER SHEET**

**Unlimited** (Amount demanded exceeds \$25,000)  **Limited** (Amount demanded is \$25,000 or less)

**Complex Case Designation**  
 **Counter**  **Joinder**  
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:  
**16 CV 297313**

JUDGE:  
 DEPT.:

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:
- |   |   |  |
|---|---|--|
| <p><b>Auto Tort</b></p> <p><input type="checkbox"/> Auto (22)</p> <p><input type="checkbox"/> Uninsured motorist (46)</p> <p><b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b></p> <p><input type="checkbox"/> Asbestos (04)</p> <p><input type="checkbox"/> Product liability (24)</p> <p><input type="checkbox"/> Medical malpractice (45)</p> <p><input type="checkbox"/> Other PI/PD/WD (23)</p> <p><b>Non-PI/PD/WD (Other) Tort</b></p> <p><input type="checkbox"/> Business tort/unfair business practice (07)</p> <p><input type="checkbox"/> Civil rights (08)</p> <p><input type="checkbox"/> Defamation (13)</p> <p><input type="checkbox"/> Fraud (16)</p> <p><input type="checkbox"/> Intellectual property (19)</p> <p><input type="checkbox"/> Professional negligence (25)</p> <p><input type="checkbox"/> Other non-PI/PD/WD tort (35)</p> <p><b>Employment</b></p> <p><input type="checkbox"/> Wrongful termination (36)</p> <p><input type="checkbox"/> Other employment (15)</p> | <p><b>Contract</b></p> <p><input type="checkbox"/> Breach of contract/warranty (06)</p> <p><input type="checkbox"/> Rule 3.740 collections (09)</p> <p><input type="checkbox"/> Other collections (09)</p> <p><input type="checkbox"/> Insurance coverage (18)</p> <p><input type="checkbox"/> Other contract (37)</p> <p><b>Real Property</b></p> <p><input type="checkbox"/> Eminent domain/Inverse condemnation (14)</p> <p><input type="checkbox"/> Wrongful eviction (33)</p> <p><input type="checkbox"/> Other real property (26)</p> <p><b>Unlawful Detainer</b></p> <p><input type="checkbox"/> Commercial (31)</p> <p><input type="checkbox"/> Residential (32)</p> <p><input type="checkbox"/> Drugs (38)</p> <p><b>Judicial Review</b></p> <p><input type="checkbox"/> Asset forfeiture (05)</p> <p><input type="checkbox"/> Petition re: arbitration award (11)</p> <p><input type="checkbox"/> Writ of mandate (02)</p> <p><input type="checkbox"/> Other judicial review (39)</p> | <p><b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b></p> <p><input type="checkbox"/> Antitrust/Trade regulation (03)</p> <p><input type="checkbox"/> Construction defect (10)</p> <p><input type="checkbox"/> Mass tort (40)</p> <p><input type="checkbox"/> Securities litigation (28)</p> <p><input type="checkbox"/> Environmental/Toxic tort (30)</p> <p><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)</p> <p><b>Enforcement of Judgment</b></p> <p><input type="checkbox"/> Enforcement of judgment (20)</p> <p><b>Miscellaneous Civil Complaint</b></p> <p><input type="checkbox"/> RICO (27)</p> <p><input checked="" type="checkbox"/> Other complaint (not specified above) (42)</p> <p><b>Miscellaneous Civil Petition</b></p> <p><input type="checkbox"/> Partnership and corporate governance (21)</p> <p><input type="checkbox"/> Other petition (not specified above) (43)</p> |
|---|---|--|

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a.  Large number of separately represented parties d.  Large number of witnesses
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c.  Substantial amount of documentary evidence f.  Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (specify): **2**
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 07/01/2016

**Youlanda Leshay Fox**

(TYPE OR PRINT NAME)

*Youlanda Leshay Fox*

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.