

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

JUN 02 2015

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

AT GHEE...
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY KW DEPUTY

*

Keyonna Ferrell *
Extended Stay Hotel
12190 Sunset Hills Road
Reston, Va 12190 room 163 (send to this address only or both)
AND
715 Blvd Road
Sumter, Sc 29153

(Full name and address of the plaintiff)
Plaintiff(s)

vs.

Yahoo

TDC 15 CV 1618
Civil No.: _____
(Leave blank. To be filled in by Court.)

(Full name and address of the defendant(s))
Defendant(s)

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) _____

2. The facts of this case are:


I have a pininterest page. I changed it around Feb 5th of 2015. Before I put all the celebrity stuff up. I changed my screen name from Keyonna Ferrell to K Ferrell and my web url was also changed. The email I have of the exact day I did all this is vague but its in feb the other email I have of exact proof is in march both are copied below. The problem is yahoo Has a suammry of a a summary I had o pininterest for one week in the beginning of feb and then took it down. If you click on the link the page s outdated the web url is outdated. The email proves when it was changed. Almost 3 months ago. Yahoos articles and the yahoo person I talked to said it takes 6-8 weeks it been nearly three months. The summary was a joke meant in jest but people not knowing that will take it the wrong way. I have emails That I have sent to yahoo and a phone conversation I recorded. There is also a video of what looks to be a high school kid dancing to a provocative song. I first requested this be removed the end of 2014 it was removed and then put back up. Removed once I emailed again and then put back up. Once the celebrities stuff went off they were unwilling to take it down. And tried to lie and say I was using the wrong email.Me having to sue search engines is ridiculous BUT that's defamation of character Im a Christina woman and half of this crap I wouldn't do unless I was married. Ive contacted these people over and over again and my whole LIFE is watching. Yahoo and google are defaming my character.

Move to Inbox

More

135 of about 159

Deleted Image

Inbox 

Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Feb 5

to me

I deleted my image from pin interest. It is still showing up in google images. When I go to view page another picture pops up so that I cant delete the image via page removal request form.

----- Forwarded message -----

From: **Pinterest Help** <help@pinterest.zendesk.com>
Date: Thu, Apr 23, 2015 at 4:40 PM
Subject: [Pinterest Help] Re: Remove Name From Google
To: Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

##- Please type your reply above this line -##



Maggie (Pinterest Help)

Apr 23, 14:40

This request was closed and merged into request [#2210206](#) "Name appearing in GOOGLE".

Keyonna Ferrell

Apr 23, 02:41

My full name has been removed from PININTEREST for atleast 3-4 months my web link for Pininterest for atleast a month. WHY IS MY FULL NAME still being associated with my account. In fact this is not a question REMOVE IT IMMEDIATELY. My boards or any pin should not come up at all under my full name. K FERRELL could be anyone. Remove anything associated with pininterest from under my full name. This message is being copied and sent to google as well. My web link is as follows <https://www.pinterest.com/kferrell050388/> My pininterest page displays as K Ferrell

Proof

Keyonna Ferrell <keyonna.l.ferrell@gmail.com> Fri, Mar 13, 2015 at 1:24 PM
To: Pinterest Help <help+id2168735@pinterest.zendesk.com>
Sweetheart dont start with me. Me changing my name from Keyonna Ferrell to K Ferrell implies I want privaacy. I wasnt aware my name was in the address bar.However my profile appears on a webscreen or ANYWHERE it should appear

THAT way everywhere. I have a RIGHT to know whats displayed WHERE. I dont care if it is public information me changing my name to KFERRELL implies I want privacy. You brought attention to it. Equal to me spilling coffee on my shirt you taking a picture and putting it on the web. Fallback. You;re done. There is nothing you can say you changed your settings to bring attention to my first name. I can SUE YOU. And I WILL. Get anothr job this aint it. We are done talking. Abowface.
[Quoted text hidden]

--

Best Regards,
Keyonna Ferrell
Keyonna.I.Ferrell@gmail.com

Maggie (Pinterest Help)

Mar 13, 11:13

Hi Keyonna,

That was your public username that was shown. It has been your username since you signed up. The way we formatted profiles on the iPhone changes, but your username has always been in the link to your profile.

For example, now it's www.pinterest.com/kferrell050388/ (what it looks like on a computer or the mobile web) and before it was www.pinterest.com/keyonnaferrell. It was public information to begin with and thus not a privacy concern. And since you changed your username, everything seems to be fine for you now.

Best,
Maggie | Community Specialist

Need a little more help? Return to the Pinterest [Help Center](#).

© Pinterest, Inc.

808 Brannan Street, San Francisco, CA 94103

[Privacy Policy](#) | [Terms and Conditions](#)

 Click here to Reply or Forward

1.21 GB (8%) of 15 GB used

[Manage](#)

[Terms - Privacy](#)

Last account activity: 49 minutes ago

[Details](#)



Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Fwd: Yahoo

1 message

Keyonna Ferrell <keyonna.l.ferrell@gmail.com>
To: media@yahoo-inc.com

Mon, May 25, 2015 at 9:32 PM

Read Below

----- Forwarded message -----

From: Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Date: Mon, May 25, 2015 at 9:29 PM

Subject: Re: Yahoo

To: Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Yahoo says outdated information is removed in 6-8 weeks this link <https://www.pinterest.com/keyonnaferrell/> under my name has been there for at least 3 weeks outdated. I will also be calling. My name is Keyonna Ferrell. This link is to a pininterest page that has been updated my full name and this brief message that is being displayed in yahoo was up for a week in feb and then taken down. The page has been changed for at least three months. In fact that link goes to a WHOOPS page. REMOVE THIS IMMEDIATELY please.'

Also I requested more than a few times the youtube which comes up under my name which suggest sexually explicit sexual nature be removed it was removed once before and then re added removed and readded after i EMAILED THEM numerous of times. I will forward you those emails. Will also be calling headquarters tomorrow morning if this isnt resolved promptly I will be retaining a lawyer. Defamation of character.

I am requesting it all be removed IMMEDIATELY.

On Mon, May 25, 2015 at 5:09 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:

Yahoo says something about support to have information removed but there is no support information listed the contact button takes you to ARTICES

On Mon, May 25, 2015 at 5:06 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:

The link associated with the whoops page has

been removed for atleast three months. There is no way to conact yahoo and make them remove it done purposely. if I have to sue yahoo yall paying me MILLIONS thats a reputation I cant get back.

This was found on the following

<https://help.yahoo.com/kb/search/remove-search-results-yahoo-search-sln4530.html>

Remove search results from Yahoo Search

Yahoo Search displays Web results from around the internet. These include results from Yahoo websites, and non Yahoo websites.

Good to know: When you're requesting that a specific search result be removed from Yahoo Search, it's important to know whether the result is from a Yahoo website, or a non-Yahoo website. Yahoo has no control over what is published outside of the Yahoo network.

Search results from non Yahoo websites

If the search result you want removed is a non-Yahoo webpage, we recommend first contacting that website's owner, content provider, or domain provider with your request.

- A website's contact info is often located on the website itself.
- You can look up a website's domain provider through services like WhoIs.net.

When will Yahoo Search remove a result that a website's unpublished?

After a non-Yahoo website has updated their content, Yahoo Search will reflect the update after our next content refresh cycle completes (up to 6-8 weeks). Until then, you'll still see the result in question in Yahoo Search results.

What if my personal info is published?

If a website contains personally identifiable information, known as "PII" (like a social security number, or credit card number), then Yahoo may be able to remove the info from our search results, even though we can't control the website

where it's published.

See our support options for more assistance. You'll need to provide the personal info being displayed so we can investigate.

Personal names aren't unique: Several people may have the same name. So Yahoo Search results with content about a different person, with the same name as you, may not be subject to change or removal.

FAQ

Question: What if the info that I'd like removed is no longer published on a website, but that info still shows up in Yahoo Search?

Answer: Yahoo Search results that "reference" a Web page that is no longer published will automatically be removed from the Yahoo Search results during the next refresh. This refresh occurs regularly and automatically, and can take up to 6-8 weeks.

Clean up your search results: With Yahoo Search SafeSearch, you can filter out explicit, inappropriate, and adult-oriented content.

Remove search results from Yahoo Search

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Clean up your search results: With Yahoo Search SafeSearch, you can filter out explicit, inappropriate, and adult-oriented content.

Move to Inbox

More

14 of 23

Re: Video Pulling up under my name in yahoo search result.

Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

May 11

to Google

This video still appearing there is also A NEW description of a my pinterest page that has been changed for atleast 3 months and it was put after IT was changed which is how I know GOOGLE is retaliating. _DEFAMATION OF CHARACTER-I have written you numerous of times about the ferrell video above the beyonce partition video that pulls up under my name all of it counts as defamation of character. The Link is as follows. Its a DEAD link. Why is it still even appearing in YAHOO when it didnt even appear when it was ORGINIALLY posted. TAKE IT DOWN NOW.

<https://www.pinterest.com/keyonnaferrell/>

1. Keyonna Ferrell on Pinterest

www.pinterest.com/keyonnaferrell

Keyonna Ferrell | I want this forever. Five to Life <3

2. 1 person named Keyonna Ferrell in the US |...

names.whitepages.com/Keyonna/Ferrell

Find **Keyonna Ferrell** on WhitePages. There is 1 person named **Keyonna Ferrell** in places like Maryland.

3. Keyonna Ferrell - Image Results

On Fri, May 1, 2015 at 11:36 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:

1.

- This page is still up and active. I have never recieved a response from Yahoo before now the video was just removed. Now its PUT back up WITH other CRAP Beyonces patition video.
- They are fanning the flames. Yahoo is taking my their platform and creating an agenda messing up my reputation in the process.

○

○

○

○ Web

○ News

○ Local

○ Answers

○ Maps

○ Images

○ Video

More

2.

○ Anytime

○ Past day

○ Past week

- Past month

1. **Keyonna Ferrell on Pinterest**

www.pinterest.com/keyonnaferrell

Keyonna Ferrell | I want this forever. Five to Life <3

2. **Keyonna Ferrell - Suitland, MD | MyLife.com®**

- www.mylife.com
- > Home
- > Maryland
- > Suitland

Find out more about **Keyonna Ferrell** on MyLife.com®. Search results include location, phone and messaging. We make People Search easy.

3. **Keyonna Ferrell - Image Results**

-
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More Keyonna Ferrell images

4. **1 person named Keyonna Ferrell in the US |...**

names.whitepages.com/Keyonna/Ferrell

Find **Keyonna Ferrell** on WhitePages. There is 1 person named **Keyonna Ferrell** in places like Maryland.

5. Ferrell's Video - YouTube

www.youtube.com/watch?v=vu_wq6dzE3wCached

Jun 18, 2010 · Ferrell's Video - YouTube ... Briscoqwsa

6. Keyonna Ferrell - Google+

plus.google.com/111313338914837439631Cached

Keyonna Ferrell hasn't shared anything on this page with you.

7. NamesDatabase: Keyonna Ferrell | Crossland High...

- o namesdatabase.com
- o > [Home](#)
- o > [Ferrell](#)
- o > [Keyonna](#)

Connect to: **Keyonna Ferrell**. Come find out who else is on NamesDatabase. We are a community of over thirty million members who can connect with each other through ...

8. Beyoncé - Partition (Explicit Video) | (SOUND) |...

www.pinterest.com/pin/390828073886547694Cached

Keyonna Ferrell 31 Follow. See more boards. Related Pins Pin it. Like. youtube.com. PLAY 3 Doors Down - Love Me When I'm Gone - I love this video. Thank you to all ...

9. David Ferrell - Millersville, MD | MyLife.com®

- o www.mylife.com
- o > [Home](#)
- o > [Maryland](#)
- o > [Millersville](#)

Are you looking for **David Ferrell**? Instantly view David's contact info including address, phone number, relatives and other contact info. Discover what David has been ...

10. Keonna Ferrell | Whitepages

www.whitepages.com/name/Keonna-Ferrell

View **Keonna Ferrell**'s phone number, address and more on Whitepages. Find 1 listing for **Keonna Ferrell** in the US/Canada. Whitepages is the largest and most trusted ...

11. Temple Hills, Maryland: Crossland High School...

- o namesdatabase.com
- o > ...
- o > [Maryland](#)
- o > [Temple Hills](#)

Crossland High School Temple Hills, Maryland, United States. Click below to see which schoolmates are listed in the NamesDatabase:

1. [12345Next13,500 results](#)

On Wed, Apr 8, 2015 at 7:44 AM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
NO MAM/No Sir I have sent all previous emails via this channel and my request was answered by the video being taken down

On Wed, Apr 8, 2015 at 12:07 AM, Google Press <press@google.com> wrote:
Hi there,

Unfortunately your concerns cannot be addressed by contacting this alias. Please review the following resources to get a better idea of where you can report your issue.

If your concern involves a legal issue, please submit your details through our online form at <http://support.google.com/youtube/bin/answer.py?hl=en&answer=140536>. We must receive your claim in the requested format in order to investigate and process your request.

If you have concerns relating to hate speech, your privacy, safety, or other abuse issues, please visit our Safety and Abuse reporting tool at <http://www.youtube.com/reportabuse>. Here you will find information that will help you understand your situation as well as be able to report content that may violate our guidelines.

For help with other site-related issues, please visit our Help Center at <http://www.google.com/support/youtube/>.

Sincerely,

The YouTube Team

Google Press Team

For news, updates, and tips & tricks, follow-us on [Google+](#), [Facebook](#), and [Twitter](#).

On Wed, Apr 8, 2015 at 12:51 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
As of 4/7/2015

On Tue, Apr 7, 2015 at 10:51 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
This is the second page on search results.

1. [David Ferrell - Millersville, MD | MyLife.com®](#)

- o www.mylife.com
- o › [Home](#)
- o › [Maryland](#)
- o › [Millersville](#)

Are you looking for David **Ferrell**? Instantly view David's contact info including address, phone number, relatives and other contact info. Discover what David has been ...

2. [Catrina Cousar-Ferrell | LinkedIn](#)

www.linkedin.com/pub/catrina-cousar-ferrell/26/784/685

View Catrina Cousar-**Ferrell**'s professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like Catrina Cousar-**Ferrell** ...

3. [Ferrell's Video - YouTube](#)

www.youtube.com/watch?v=vu_wq6dzE3w

Jun 18, 2010 · **Ferrell's Video - YouTube**

4. [Keyonna - Names Directory](#)

www.namesdir.com/F_KeyonnaCached

Keyonna Ferrell Keyonna Fleming Keyonna Gillis Keyonna Goldsmith Keyonna Goodwin Keyonna Gover Keyonna Graham Keyonna Granberry Keyonna Grandberry Keyonna Grant

5. [Who is A Keeton - \(541\) 475-3980 - Madras - OR - waatp.com](#)

waatp.com/people/a-keeton/299023Cached

Who is A Keeton - (541) 475-3980 - Madras - OR - waatp.com. See also A Keeton: pictures, social networks profiles, videos, weblinks, at blogs, at news, books ...

6. [Keyonna Cassidy | Facebook](#)

www.facebook.com/keyonna.cassidyCached

Keyonna Cassidy is on Facebook. Join Facebook to connect with **Keyonna Cassidy** and others you may know. Facebook gives people the power to share and makes...

7. [Keyonna Benoit - Biography - IMDb](#)

www.imdb.com/name/nm5532242/bioCached

Keyonna Benoit is an actress, known for Crackula Goes to Hollywood (2015). IMDb ... Will **Ferrell** and Kristen Wiig have made a secret Lifetime TV movie

8. [Keyonna Moore Facebook, Twitter & MySpace on PeekYou](#)

www.peakyou.com/keyonna_moore

Looking for **Keyonna** Moore ? PeekYou's people search has 18 people named **Keyonna** Moore and you can find info, photos, links, family members and more

9. Keyonna Wells, LLBSW - Waterford, MI - Healthcare ...

- o www.healthgrades.com
- o > ...
- o > [Michigan \(MI\)](#)
- o > [Waterford](#)

Visit Healthgrades for information on **Keyonna** Wells, LLBSW. Find Phone & Address information, medical practice history, affiliated hospitals and more.

10. Keyonna Harrington | Facebook

www.facebook.com/keyonna.harringtonCached

Keyonna Harrington is on Facebook. Join Facebook to connect with **Keyonna** Harrington and others you may know. Facebook gives people the power to share and...

On Tue, Apr 7, 2015 at 10:45 PM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
This video was removed again after the email above AND then put back up AGAIN. I have proof it was removed (WILL SEND IT AFTER THIS EMAIL). And then put back up. I can sue you for defamation of character. I am requesting this information be removed immediately this video defames a character. I don't even now the dude he looks like a high school kid. Conspiracy is also against the law.

https://www.youtube.com/watch?v=vu_wq6dzE3w

On Tue, Feb 3, 2015 at 5:53 AM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
I have already sent an email to youtube to request for this email to be removed see email above. It was removed from under my search results and then put back up. I will sue should this become an ongoing problem. I am requesting this be removed immediately.

On Tue, Dec 30, 2014 at 1:30 AM, Keyonna Ferrell <keyonna.l.ferrell@gmail.com> wrote:
This video https://www.youtube.com/watch?v=vu_wq6dzE3w is pulling up under my search results. Keyonna Ferrell in Yahoo search results. Not only is it defamation of character but my name of person is listed or no where present in his youtube channle or video. I am asking the video be removed entirely or be removed from MY search results. Its obvious what he is doing. He was using my boards which use to be up for attention. His channel gets alot of traffic.

--
Best Regards,
Keyonna Ferrell

Keyonna.l.Ferrell@gmail.com
301-928-5149

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Best Regards,
Keyonna Ferrell
Keyonna.l.Ferrell@gmail.com
301-928-5149

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Best Regards,
Keyonna Ferrell
Keyonna.l.Ferrell@gmail.com
301-928-5149

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Best Regards,
Keyonna Ferrell
Keyonna.l.Ferrell@gmail.com
301-928-5149

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Best Regards,
Keyonna Ferrell
Keyonna.l.Ferrell@gmail.com
301-928-5149

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Best Regards,

Keyonna Ferrell
Keyonna.l.Ferrell@gmail.com
[301-928-5149](tel:301-928-5149)

Attachments area

[Preview YouTube video Ferrell's Video](#)



I sent forwarded all this yahoo via media@yahoo-inc.com

This message is cut short because I forwarded the above



Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Fwd: Video Pulling up under my name in yahoo search result.

1 message

Keyonna Ferrell <keyonna.l.ferrell@gmail.com>

Mon, May 25, 2015 at 9:33 PM

To: media@yahoo-inc.com

Read Below

----- Forwarded message -----

From: **Keyonna Ferrell** <keyonna.l.ferrell@gmail.com>

Date: Mon, May 18, 2015 at 4:06 AM

Subject: Re: Video Pulling up under my name in yahoo search result.

To: Google Press <press@google.com>

AGAIN I have proof the video was removed from Yahoo After I sent an email here this email is listed as support. Yall changing your story now that im attached to celebrities. Since you are claiming ignorance do you have Yahoos contact information for Yahoo web search removals?

On Mon, May 18, 2015 at 4:02 AM, Google Press <press@google.com> wrote:

Hi there,

Again, your concerns unfortunately cannot be addressed by contacting this alias. Please review the following resources to get a better idea of where you can report your issue.

If your concern involves a legal issue, please submit your details through our online form at <http://support.google.com/youtube/bin/answer.py?hl=en&answer=140536>. We must receive your claim in the requested format in order to investigate and process your request.

If you have concerns relating to hate speech, your privacy, safety, or other abuse issues, please visit our Safety and Abuse reporting tool at <http://www.youtube.com/reportabuse>. Here you will find information that will help you understand your situation as well as be able to report content that may violate our guidelines.

For help with other site-related issues, please visit our Help Center at <http://www.google.com/support/youtube/>.

Sincerely,
The YouTube Team

Yahoo Search Results

1.
 -
 - News
 - Local
 - Answers
 - Images
 - Video
 - Shopping

More

2.
 - Anytime**
 - Past day
 - Past week
 - Past month

1. **Keyonna Ferrell on Pinterest**

www.pinterest.com/keyonnaferrell

Keyonna Ferrell | I want this forever. Five to Life <3

2. **1 person named Keyonna Ferrell in the US |...**

names.whitepages.com/**Keyonna/Ferrell**

Find **Keyonna Ferrell** on WhitePages. There is 1 person named **Keyonna Ferrell** in places like Maryland.

3. **Keyonna Ferrell - Image Results**



○



○



○



○



○



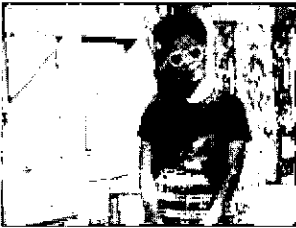
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○

[More Keyonna Ferrell images](#)

4. [Keyonna Ferrell - Suitland, MD | MyLife.com®](#)

- www.mylife.com
- > [Home](#)
- > [Maryland](#)
- > [Suitland](#)

Find out more about **Keyonna Ferrell** on MyLife.com®. Search results include location, phone and messaging. We make People Search easy.

5. Ferrell's Video - YouTube

www.youtube.com/watch?v=vu_wq6dzE3w Cached

Jun 18, 2010 · Ferrell's Video - YouTube ... Briscoqwsa

6. Keyonna Ferrell - Google+

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

Damages in the amount of: 500,000-100,000_____

An injunction ordering: ALL pininterest stuff be removed. Specifically this search result Profile is on Private and video be removed permenently from my search results_____

Other (explain) _____

06/01/2015

(Date)



(Signature)

Keyonna Ferrell

Extended Stay Hotel_____

12190 Sunset Hills Road room 163_____

Reston, VA
240-210-2142

(Printed name, address and phone number of
Plaintiff)

(Printed name, address and phone number of
Plaintiff)

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.

General Information

Court	United States District Court for the District of Maryland; United States District Court for the District of Maryland
Federal Nature of Suit	Civil Rights - Other[440]
Docket Number	8:15-cv-01618