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# IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

MAR 2 5 2019

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

TAMI HARRISON,

Plaintiff,

- against -

FACEBOOK, INC., a Delaware corporation.

Defendant.

COCKET No. V 19 1547 SVK

JURY TRIAL DEMANDED



### COMPLAINT

Plaintiff Tami Harrison ("Harrison" or "Plaintiff") by pro se, unless counsel is assigned thereafter filing for the Complaint against Defendant Facebook ("Facebook" or "Defendant") hereby alleges as follows:

### NATURE OF THE ACTION

1. This is an action for copyright infringement under Section 501 of the Copyright Act. This action arises out of Defendant's unauthorized public display of copyrighted images and video owned and/or registered by Tami Harrison, an Alabama based entrepreneur. Accordingly, Harrison seeks monetary relief under the Copyright Act of the United States, as amended, 17 U.S.C. § 101 et seq.

### JURISDICTION AND VENUE

- 2. This claim arises under the Copyright Act, 17 U.S.C. § 101 et seq., and this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).
- 3. This Court has personal jurisdiction over Defendant because Defendant's business is located in California. This filing was previously filed in The Southern District Court Of Alabama to be dismissed without prejudice to be re-filed in this district for the Defendant's preference as granted by the judge in Mobile, Al with case# 18-cv-147-TM-MU. Plaintiff is now in Atlanta, Georgia and willing to travel to California if needed in pursuit of justice.

4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b).

### **PARTIES**

- 5. Harrison is an inventor and entrepreneur in the business of inventing, selling and aspiring to sell products, founder and President of two companies Now Care Products, LLC and Seed Volage Tech Corporation having a usual place of business at 507 Booker Street Mobile, Al 36604.
- 6. Defendant Facebook, Inc. ("Facebook") is a Delaware corporation with its principal place of business at 1 Hacker Way, Menlo Park, California 94025. Upon information and belief, At all times material hereto, Facebook has owned and operated a website at the URL: www.facebook.com (the "Website").

## STATEMENT OF FACTS

- A. Background and Plaintiff's Ownership of the Photograph/Images
- 8. Harrison is the author of the images/video and has at all times been the sole owner of all right, title and interest in and to the images, including the copyright thereto.
- 9. The images have US Copyright numbers of: 1. Mini Reel Weed Eater Copyright# 1-3368554769; 2. Fast Learn writing and typing app Copyright# 1-3396451021; 3. Reel Weed Trimmer Copyright# 1-3514890321; 4. Handwriting OCR copyright# 1-3348370361; 5. Basketball goal assembly with scissor lift copyright# 1-2633986301.

### **GENERAL ALLEGATIONS**

10. Upon information and belief, the Website features the images and video on display on Facebook.

See <a href="https://www.facebook.com/handwritingapp">https://www.facebook.com/handwritingapp</a> and

https://www.facebook.com/basketball-invention and https://www.facebook.com/weedtrimmer

The Website prominently featured the copyrighted and trademarked images. A true and correct copies of the article is attached hereto as Exhibit B. Displaying these images on Defendant's site caused damages by losing business deals by the appearance of Plaintiffs social media account lacking traction and interest from buyers because Plaintiff couldn't manage their content to edit or add information or gain followers by placing ads. Defendant stated in writing that Plaintiff had a grey business account and it had to be attached to a profile in 2015 as their site made changes to their policy, see attached hereto as Exhibit C. After time and not being able to manage the business account on November 2016 Plaintiff demanded removal of all content, see attached copy of article hereto as Exhibit C.

- 11. Facebook had consent previously when Plaintiff and staff was able to log on to their website to manage it, but after Plaintiff was not able to manage their pages they rescinded authorization to Facebook in writing and asked repeatedly to remove and that Facebook did not have Plaintiff's permission or consent to publish the images on its Website thereafter. Upon information and belief, the Defendant is responsible for the events described herein and are liable to Plaintiff for the damages they have incurred.
- 12. Social media is the platform companies use to engage and promote their products. Facebook is a global online social networking service with over one billion active users that utilize the service to stay connected with friends and family as well as allow businesses to promote to consumers. Facebook is the number one social media site that allows companies to make their presence known to the public. Facebook regularly and continuously does business in the State of Alabama. In 2011, it was reported Facebook has 2 million users in the State of Alabama.
- 13. Plaintiff demanded that Facebook remove their entire timeline of all data and

unauthorized public display of images and video in November 2016 and other days. However, Facebook continues to unlawfully publicly display the unauthorized work referred to herein.

14. This action for copyright infringement is brought against Defendant Facebook arising from Defendant's willful and knowing infringement of Plaintiffs' copyrights. Facebook's unlawful use of Harrison's copyrighted materials have infringed Harrison's copyright by public display resulting in unfair business practices, unfair competition, false light, right of publicity and lost profits attributable thereto, entitling Harrison to actual and/or statutory damages under the Copyright Act. See attached copy of article hereto as Exhibit D.

## <u>COUNT I</u> COPYRIGHT INFRINGEMENT

- 12. Plaintiffs repeat and re-allege each of the foregoing paragraphs, as though fully set forth herein.
- 13. Facebook infringed Plaintiff's copyright in the images and video by publicly displaying the images and video on the Website. Facebook was not authorized to publically display and/or use the material when Plaintiff sent notice by writing more than once. Plaintiff sent in information as requested from Defendant.
- 14. The acts of Defendant complained of herein constitute infringement of Plaintiff's copyright and rights under copyright in violation of Sections 106 and 501 of the Copyright Act, 17 U.S.C. §§ 106 and 501.
- 15. Upon information and belief, the foregoing acts of infringement by Facebook have been willful, intentional, and purposeful, in disregard of and indifference to Plaintiff's rights.

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- 16. As a direct and proximate cause of the infringement by the Defendant of Plaintiff's copyright and exclusive rights under copyright, Plaintiff is entitled to damages pursuant to 17 U.S.C. § 504(b) for the infringement.
- 17. Defendant's conduct, described above, is causing, and unless enjoined and restrained by this Court, will continue to cause Plaintiff irreparable injury that cannot be fully compensated by or measured in money damages. Plaintiff has no adequate remedy at law.
- 23. As a result of the wrongful conduct of Facebook as alleged herein, Plaintiff is entitled to recover from Facebook the damages, that she sustained and will sustain by Facebook because of their violations of 17 U.S.C. § 1202, including attorney's fees and costs if applicable.
- 24. Defendants' infringements of Plaintiffs' rights each constitute a separate and distinct act of infringement, separately actionable under the Copyright Act, 17 U.S.C. § 106.
- 25. Alternatively, Plaintiff may elect to recover from Facebook statutory damages pursuant to 17 U.S.C. § 1203(c) (3) in a sum of at least \$2,500 up to \$25,000 for each violation of 17 U.S.C. § 1202.\_

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment as follows:

- That Defendant Facebook be adjudged to have infringed upon Plaintiff's copyrights in violation of 17 U.S.C §§ 106 and 501;
- 2. Plaintiff be awarded Plaintiff's actual damages of infringement of Plaintiff's copyrighted images;
- 3. That, with regard to the Relief, Plaintiff be awarded either: a) Plaintiff's actual damages

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and b) alternatively, statutory damages of at least \$2,500 and up to \$ 25,000 for each

instance pursuant to 17 U.S.C. § 1203(c);

4. That Defendant be required to account for all losses derived by Plaintiff as a result of

its unlawful conduct including losses attributable to the infringement, as will be proven

at trial. The Defendant Facebook knowingly after receiving notice to remove continued

to infringe;

5. That Plaintiff be awarded her costs, expenses and attorneys' fees if applicable

pursuant to 17 U.S.C. § 1203(b);

That Plaintiff be awarded pre-judgment interest; and 6.

7. Such other and further relief as the Court may deem just and proper.

**DEMAND FOR JURY TRIAL** 

Plaintiff hereby demands a trial by jury on all issues so triable in accordance with Federal Rule of Civil Procedure 38(b).

Dated: 03/25/2019

By:

Tami Harrison

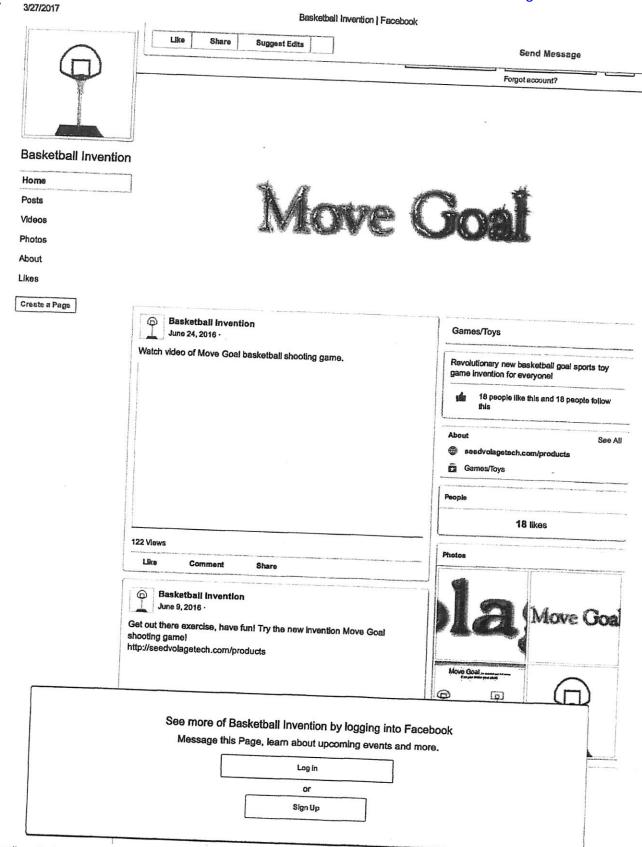
PO BOX 310303 Atlanta, GA 31131

Tel: (251) 494-8221 money5510@att.net

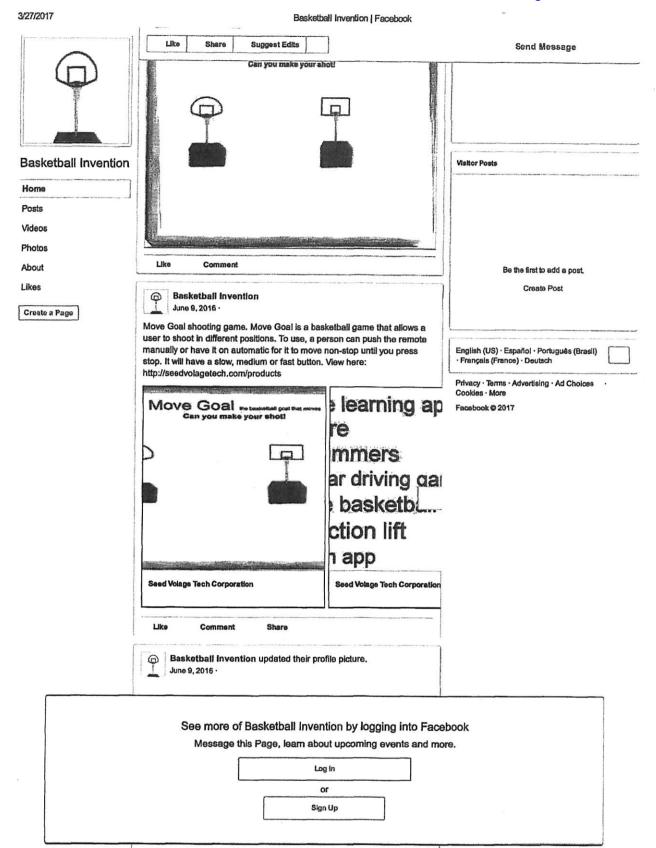
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# **EXHIBIT B**

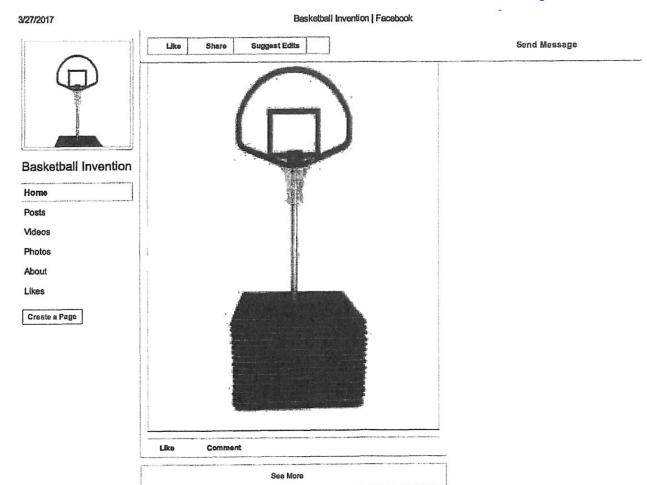
## Case 5:19-cv-01547-SVK Document 1 Filed 03/25/19 Page 8 of 57

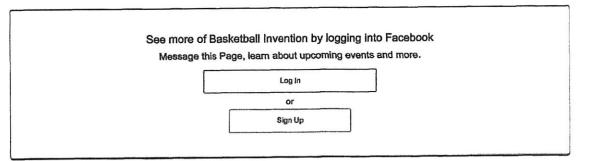


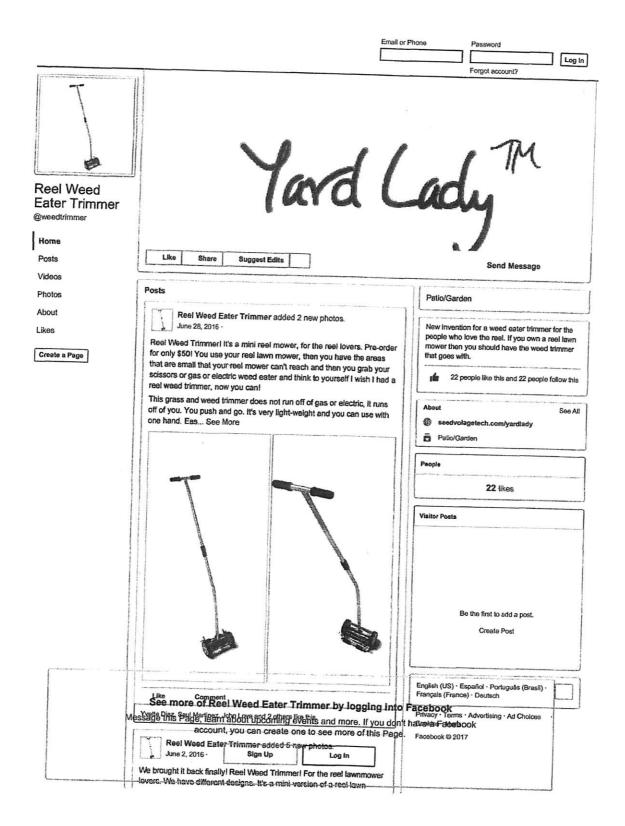
## Case 5:19-cv-01547-SVK Document 1 Filed 03/25/19 Page 9 of 57

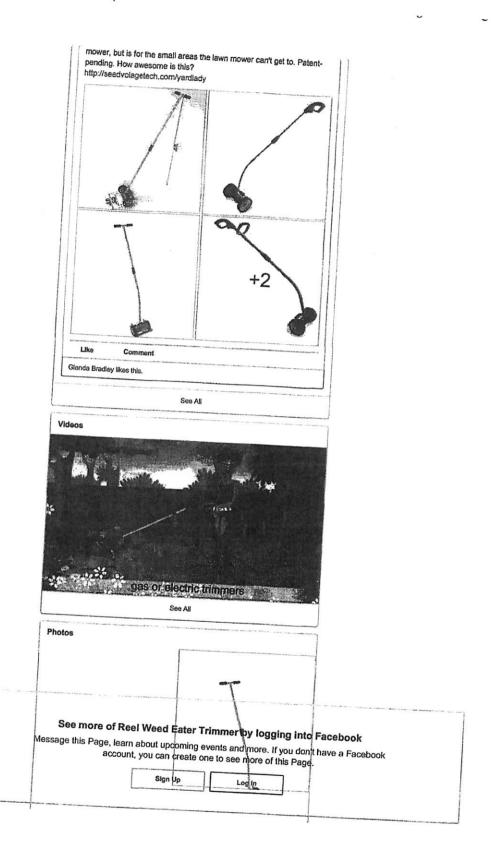


## Case 5:19-cv-01547-SVK Document 1 Filed 03/25/19 Page 10 of 57



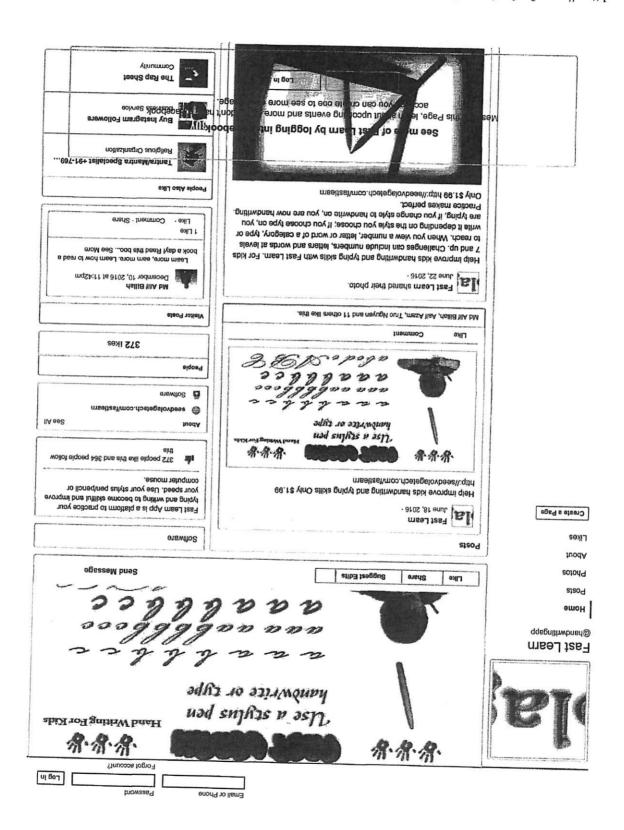






3/4/2017

https://www.facebook.com/handwritingapp



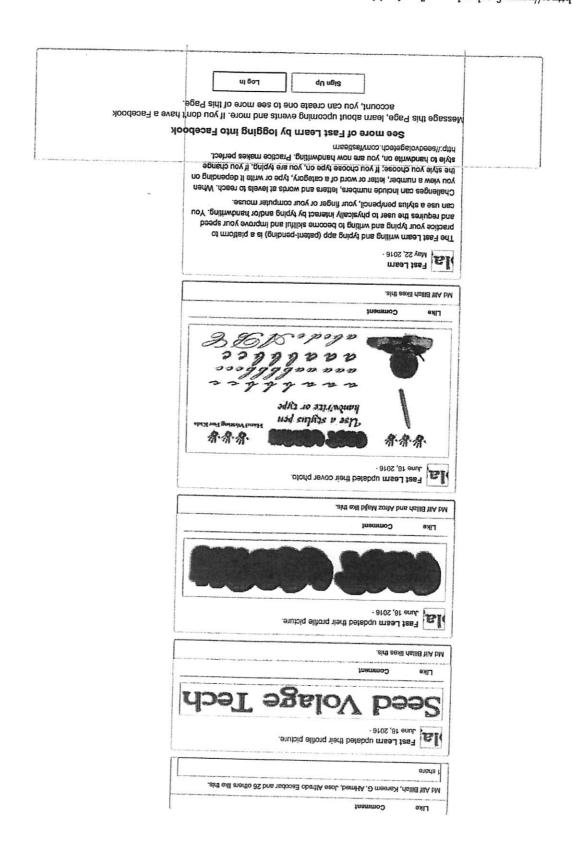
Fast Learn	
June 18, 2016 ·	
Help improve kids handwriting and typing skills with Fast Learn. For kids 7 and up.  Challenges can include numbers, letters and words at levels to see his to be a few letters.	English (US) · Español · Português (Brasil) · Français (France) · Deutsch
Challenges can include numbers, latters and words at levels to reach. When y  See More	
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Like Comment	Facebook © 2017
Md Allf Billah, Afroz Majid, Dianne Sommerfield and 5 others like this.	
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Posts	
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https://www.facebook.com/handwritingapp

3/4/2017

# **EXHIBIT C**

From: Facebook Global Marketing Solutions <fbadsupport@fb.com>

To: "footpedicure@yahoo.com" <fcotpedicure@yahoo.com>

Sent: Monday, March 16, 2015 3:19 PM

Subject: Your Facebook Advertising Support Request [ ref:\_00DA0K9kF.\_50012QtJc4:ref ]

Hello,

Thank you for reaching out to our team. I'm happy to assist with your account issue today.

I have reviewed your account and I can confirm that you currently have a Gray account, or what is also referred to as a business account. Facebook is in the process of phasing out these types of accounts, and now requires all gray accounts to be attached to a Profile, or to be migrated to our Business Manager tool. More information on the required migration can be found here: https://www.facebook.com/help/600757573354939?sr=4&query=Business+Account&sid=0UkGRsK6ksFdd5ekR

I hope this information is helpful. Please let me know if you have any further questions.

Thank you,

Nick Global Marketing Solutions Facebook

--- Original Message ---

Customer Question/Comment: I don't have a personal facebook account. Why are you banning me from boosting post. This is bad business. Everyone doesn't have a personal facebook account. I'm only on here for business. So I suspect you don't want my business.

Nick Global Marketing Solutions Facebook

ref: 00DA0K9kF.\_50012QtJc4:ref

Nick Global Marketing Solutions Facebook

Subject:	Fw: Getting back onto Facebook	The state of the s
From:	Tracy Smith (footpedicure@yahoo.com)	
To:	change352@yahoo.com;	and the second s
Date:	Wednesday, March 28, 2018 12:50 PM	

-- Forwarded Message -----

From: Facebook <notification+kjdp55-5w\_\_m@facebookmail.com>

To: footpedicure@yahoo.com

Sent: Friday, February 27, 2015 9:29 AM Subject: Getting back onto Facebook

## facebook

Sorry you've been having trouble logging into your Facebook account.

Get back on Facebook now

You can also get password help or login help on Facebook.

If you're still having trouble or believe this was sent by mistake, please visit our login help page: https://www.facebook.com/help/login

This message was sent to tootped our gyahec com. If you den't want to receive these strains from the future, please unsubscribe. Facebook, Inc., Attention, Department 415, P.O. Box 10005; Pajo Alley, Co.

From: Facebook <appeals+u1lyt6at.aeau2xu2nm@support.facebook.com>

To: nowcareproducts@yahoo.com Sent: Friday, November 11, 2016 3:02 PM Subject: Re: Thank you for submitting your ID
Hi,
Thanks for your report. We'll review the information you provided and get back to you soon.
In the meantime, you can review our Community Standards to learn more about what is and isn't allowed on Facebook:
https://www.facebook.com/communitystandards/?ref=CR
We appreciate your patience.
View updates from your Support Inbox: https://fb.me/1G0t98EiSwV9f6u
Thanks,
The Facebook Team

Subject:	Intellectual Property Report #269729676774164
From:	Facebook (ip+u26yd2ty.aeaqhns5fq@support.facebook.com)
To:	nowcareproducts@yahoo.com;
Date:	Monday, February 20, 2017 10:37 PM

Hi,

The Facebook Team received a report from you. For reference, your complaint number is 269729676774164.

Please note that this channel is only for reports of alleged infringements or violations of your legal rights, such as copyright or trademark. If you filed that type of report, no further action is necessary. However, if you contacted us through this channel about another matter, you might not receive a response.

If you're not confident that your issue concerns intellectual property rights, please consult the Intellectual Property section of our Help Center for additional information:

IP Help Center: https://www.facebook.com/help/intellectual\_property/

Note that we regularly provide your contact information, including your name and email address, the name of your organization or client who owns the right in question, and/or the contents of your report to the person who posted the content you are reporting. You may wish to provide a professional or business email address for contact by users.

For help with matters other than infringement/violation of your legal rights, the links below may be helpful:

- Hacked or phished accounts: https://www.facebook.com/help/security
- Fake/Impostor accounts (timelines): https://www.facebook.com/help/174210519303259/
- Abuse (including spam, hate speech and harassment): https://www.facebook.com/help/263149623790594/
- Pages (including admin issues): https://www.facebook.com/help/pages/
- Unauthorized photos or videos: https://www.facebook.com/help/428478523862899
- Login issues: https://www.facebook.com/help/login
- Help for users who have been disabled or blocked: https://www.facebook.com/help/warnings

If the links above do not contain the information you're looking for, you may want to search the Help Center for more assistance: https://www.facebook.com/help/

As a reminder, if your submission contains a report of alleged infringement/violation of your legal rights, no further action is necessary. We will look into your matter shortly.

Thanks for contacting Facebook,

https://mg.mail.yahoo.com/neo/launch?.rand=07kre2gls17h2	3/4/2017

### The Facebook Team

To be sure you're in the right place, what best describes your issue? : I found content which I believe violates my trademark

Your name (name and surname): Tami Harrison

Your organization or client (if applicable): Seed Volage Tech Corporation Please provide a link to your organization or client's official online presence:

http://seedvolagetech.com Mailing address: PO BOX 66032

Mobile, Al 36660

Phone number: 213-787-6134

Email: nowcareproducts@yahoo.com

Confirm your email address: nowcareproducts@yahoo.com Who owns the trademark?: My organization or client Name of the rights owner: Seed Volage Tech Corporation

What is your trademark?: https://www.facebook.com/weedtrimmer

Where is your trademark registered? : Alabama

What is your trademark registration number (if applicable)?: 366 - 976

Which categories of goods and/or services are covered by your registration? : Seed Volage Tech

Corporation our other email is info@seedvolagetech.com

If possible, please provide a link (URL) leading directly to your trademark registration. : http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?

corp=366976&page=name&file=&type=ALL&status=ALL&place=ALL&city=

What type of content are you reporting? : An entire Page, group, or timeline

Please provide links (URLs) leading directly to the specific content you are reporting. Please provide one URL per line. : https://www.facebook.com/weedtrimmer

Please describe how you believe this content infringes your trademark: I sent this information before and the page is still up please remove entire timeline for nowcareproducts.com reference# Complaint #1154009371361394

Do you agree? : yes

Electronic signature: Tami Harrison

Did you receive this email in error? Please let us know: https://fb.me/21eAoAVxvrcfzWQ

From: Facebook <appeals+u1lyt6at.aeau2xu2nm@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Friday, November 11, 2016 5:14 PM Subject: Re: Thank you for submitting your ID

Hi,

Thanks for contacting us. It looks like we couldn't confirm that you're the owner of this account because you didn't provide ID with information that matches the details on this account. Please send us a photo or scan of an ID or other documents that match the info on this profile and include:

- Your name
- Your photo
- Your date of birth

When you send us a photo or scan of your ID, please cover up any personal information we don't need to confirm that you're the account owner (ex: credit card number, Social Security number).

If you don't have an ID, you can use other documents to confirm that you own this account. To learn more about what documents you can send, please visit the Help Center and check out options 2 and 3:

https://www.facebook.com/help/159098484162185/?ref=cr

Keep in mind that once we confirm that the account belongs to you, we'll delete the photo or scan of your ID or documents from our servers.

We apologize for any inconvenience, and hope to hear from you soon so we can help.

View updates from your Support Inbox: https://fb.me/1FWpR3IUIBINEGU
Thanks,
Facebook
Original Message
From: nowcareproducts@yahoo.com
To:
Subject: Thank you for submitting your ID
Email: nowcareproducts@yahoo.com
End Original Message

From: Now Care <nowcareproducts@yahoo.com>

To: "notification+kr4ygqbekmkn@facebookmail.com" <notification+kr4ygqbekmkn@facebookmail.com>

Sent: Monday, February 20, 2017 10:39 PM

Subject: info

This page is still up: https://www.facebook.com/weedtrimmer please remove. Thank-you.

---- Forwarded Message ---From: Now Care <nowcareproducts@yahoo.com>
To: Facebook <notification+kr4ygqbekmkn@facebookmail.com>
Sent: Wednesday, December 7, 2016 4:23 PM
Subject: Re: A Message from Facebook

I see you removed my 2 pages footpedicure and Seedvolagetech and I also want the entire timeline removed not just those two pages, I had more pages. Please delete everything. A lot of my images on my timeline are copyrighted as well

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

Sent: Wednesday, December 7, 2016 4:15 PM Subject: Re: A Message from Facebook

I also want the entire timeline removed not just those two pages, I had more pages. Please remove all of them. Thank-you.

From: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

To: nowcareproducts@yahoo.com

Sent: Wednesday, December 7, 2016 3:53 PM

Subject: A Message from Facebook

Hello,

We removed the following content from Facebook because we received a report alleging that it infringes or violates the rights of a third party, and/or because we have reason to believe that you're not authorized to represent the subject matter of the content.

Page: Seed Volage Tech Corporation

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 1154009371361394 Rights Owner: Tami Harrison

Email: nowcareproducts@yahoo.com

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

To keep your account in good standing, please review all materials you've posted to Facebook and remove any remaining content that may be infringing from your account.

For more information about intellectual property, please visit our Help Center:

## https://www.facebook.com/help/370657876338359/

Thanks,

The Facebook Team

From: Now Care <nowcareproducts@yahoo.com>

To: "notification+kr4ygqbekmkn@facebookmail.com" <notification+kr4ygqbekmkn@facebookmail.com> Sent: Monday, February 20, 2017 10:48 PM

Subject: Fw: info

These pages are still up please remove: <a href="https://www.facebook.com/handwritingapp/">https://www.facebook.com/handwritingapp/</a>

This page is still up: https://www.facebook.com/weedtrimmer please remove. Thank-you.

- Forwarded Message

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

Sent: Wednesday, December 7, 2016 4:23 PM Subject: Re: A Message from Facebook

I see you removed my 2 pages footpedicure and Seedvolagetech and I also want the entire timeline removed not just those two pages, I had more pages. Please delete everything. A lot of my images on my timeline are copyrighted as well.

https://www.facebook.com/inventionandpatents/

https://www.facebook.com/enddrugwarnow

https://www.facebook.com/samplesanddealsThank-you.

From: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

To: nowcareproducts@yahoo.com

Sent: Wednesday, December 7, 2016 3:53 PM

Subject: A Message from Facebook

Hello.

We removed the following content from Facebook because we received a report alleging that it infringes or violates the rights of a third party, and/or because we have reason to believe that you're not authorized to represent the subject matter of the

Page: Foot Care Products

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 1154009371361394 Rights Owner: Tami Harrison

Email: nowcareproducts@yahoo.com

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

To keep your account in good standing, please review all materials you've posted to Facebook and remove any remaining content that may be infringing from your account.

For more information about intellectual property, please visit our Help Center:

https://www.facebook.com/help/370657876338359/

Thanks,

The Facebook Team

From: Facebook <ip+u1522yo5.aeaqetvql4@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Thursday, November 24, 2016 9:11 PM

Subject: Intellectual Property Report #1154009371361394

Hi,

The Facebook Team received a report from you. For reference, your complaint number is 1154009371361394.

Please note that this channel is only for reports of alleged infringements or violations of your legal rights, such as copyright or trademark. If you filed that type of report, no further action is necessary. However, if you contacted us through this channel about another matter, you might not receive a response.

If you're not confident that your issue concerns intellectual property rights, please consult the intellectual Property section of our Help Center for additional information:

IP Help Center: https://www.facebook.com/help/intellectual\_property/

Note that we regularly provide your contact information, including your name and email address, the name of your organization or client who owns the right in question, and/or the contents of your report to the person who posted the content you are reporting. You may wish to provide a professional or business email address for contact by users.

For help with matters other than infringement/violation of your legal rights, the links below may be helpful:

- Hacked or phished accounts: https://www.facebook.com/help/security
- Fake/Impostor accounts (timelines): https://www.facebook.com/help/174210519303259/
- Abuse (including spam, hate speech and harassment): https://www.facebook.com/help/263149623790594/

- Pages (including admin issues): https://www.facebook.com/help/pages/
- Unauthorized photos or videos: https://www.facebook.com/help/428478523862899
- Login issues: https://www.facebook.com/help/login
- Help for users who have been disabled or blocked: https://www.facebook.com/help/warnings

If the links above do not contain the information you're looking for, you may want to search the Help Center for more assistance: <a href="https://www.facebook.com/help/">https://www.facebook.com/help/</a>

As a reminder, if your submission contains a report of alleged infringement/violation of your legal rights, no further action is necessary. We will look into your matter shortly.

Thanks for contacting Facebook,

The Facebook Team

To be sure you're in the right place, what best describes your issue? : I found content which I believe violates my trademark and copyright.

Your name (name and surname): Tami Harrison

Please provide a link to your organization or client's official online presence : <a href="https://www.facebook.com/seedvolagetech">https://www.facebook.com/seedvolagetech</a>

Mailing address: PO BOX 66032 Mobile, Al 36660

Phone number: 213-787-6134

Email: nowcareproducts@yahoo.com

Confirm your email address: nowcareproducts@yahoo.com

Who owns the trademark?: Me

Name of the rights owner: Tami Harrison

What is your trademark? : Seed Volage Tech Corporation

Where is your trademark registered?: Alabama

What is your trademark registration number (if applicable)?: 366 - 976

Which categories of goods and/or services are covered by your registration? : The name and page contents are owned by me

sos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=AL L&place=ALL&city=

What type of content are you reporting?: An entire Page, group, or timeline

Please describe how you believe this content infringes your trademark: This was my page and I had a worker Tracy Smith making posts and keeping page updated but she no longer works with me and I cant verify her and can use my name if I have to or either delete it if I can't log in. Let me know. Thanks.

Do you agree? : yes

Electronic signature: Tami Harrison

Did you receive this email in error? Please let us know: https://fb.me/2991al8fm0cbas0

From: Facebook <ip+u1522yo5.aeaqetvql4@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Thursday, November 24, 2016 9:11 PM

Subject: Intellectual Property Report #1154009371361394

Hi,

The Facebook Team received a report from you. For reference, your complaint number is 1154009371361394.

Please note that this channel is only for reports of alleged infringements or violations of your legal rights, such as copyright or trademark. If you filed that type of report, no further action is necessary. However, if you contacted us through this channel about another matter, you might not receive a response.

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Note that we regularly provide your contact information, including your name and email address, the name of your organization or client who owns the right in question, and/or the contents of your report to the person who posted the content you are reporting. You may wish to provide a professional or business email address for contact by users.

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- Fake/Impostor accounts (timelines): https://www.facebook.com/help/174210519303259/
- Abuse (including spam, hate speech and harassment): https://www.facebook.com/help/263149623790594/

- Pages (including admin issues): https://www.facebook.com/help/pages/
- Unauthorized photos or videos: https://www.facebook.com/help/428478523862899
- Login issues: https://www.facebook.com/help/login
- Help for users who have been disabled or blocked: https://www.facebook.com/help/warnings

If the links above do not contain the information you're looking for, you may want to search the Help Center for more assistance: <a href="https://www.facebook.com/help/">https://www.facebook.com/help/</a>

As a reminder, if your submission contains a report of alleged infringement/violation of your legal rights, no further action is necessary. We will look into your matter shortly.

Thanks for contacting Facebook,

#### The Facebook Team

To be sure you're in the right place, what best describes your issue? : I found content which I believe violates my trademark and copyright.

Your name (name and surname): Tami Harrison

Please provide a link to your organization or client's official online presence : <a href="https://www.facebook.com/seedvolagetech">https://www.facebook.com/seedvolagetech</a>

Mailing address: PO BOX 66032 Mobile, Al 36660

Phone number: 213-787-6134

Email: nowcareproducts@yahoo.com

Confirm your email address: nowcareproducts@yahoo.com

Who owns the trademark? : Me

Name of the rights owner: Tami Harrison

What is your trademark? : Seed Volage Tech Corporation

Where is your trademark registered? : Alabama

What is your trademark registration number (if applicable)?: 366 - 976

Which categories of goods and/or services are covered by your registration? : The name and page contents are owned by me

If possible, please provide a link (URL) leading directly to your trademark registration. : http://arc-

sos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&place=ALL&city=

What type of content are you reporting?: An entire Page, group, or timeline

Please describe how you believe this content infringes your trademark: This was my page and I had a worker Tracy Smith making posts and keeping page updated but she no longer works with me and I cant verify her and can use my name if I have to or either delete it if I can't log in. Let me know. Thanks.

Do you agree?: yes

Electronic signature: Tami Harrison

Did you receive this email in error? Please let us know: https://fb.me/2991al8fm0cbas0

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <ip+u1522yo5.aeaqetvqi7cpo@support.facebook.com>

Sent: Monday, December 5, 2016 6:01 PM Subject: Fw: Trademark Report Form

Please view the attached ID file below and reply back please.

I have been trying to get help for months now so just go ahead and remove all my pages because I own trademarks and do not give you permission to keep up without me being able to

Email: nowcareproducts@yahoo.com trademarks for both Now Care Products and Seed Volage Tech Corp

Just remove it completely all my pages/timeline because if I can't edit update the pages I do not want them up at all and I also own trademarks for now care products this page: facebook.com/footpedicure and here is that info:

http://tmsearch.uspto.gov/bin/showfield?f=doc&state=4802:l41u1t.7.2 The Foot System For Smoother Feet by Now Care Products serial #



Name of the rights owner: Tami Harrison

What is your trademark?: Seed Volage Tech Corporation

Where is your trademark registered?: Alabama

What is your trademark registration number (if applicable)?: 366 - 976

Which categories of goods and/or services are covered by your registration?: The name and page contents are owned by me

If possible, please provide a link (URL) leading directly to your trademark registration.: http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=AL

What type of content are you reporting?: An entire Page, group, or timeline

Please describe how you believe this content infringes your trademark: This was my page and I had a worker Tracy Smith making posts and keeping page updated but she no longer works with me and I cant verify her and can use my name if I have to or either delete it if I can't log in.

Do you agree?: yes

Electronic signature: Tami Harrison

I would prefer to keep them, but all I'm getting is ignored. If you send to another team who will

End	Original	Message
		Message

#### Attachments

• id-info.jpg (79.48KB)

#### Case 5:19-cv-01547-SVK Document 1 Filed 03/25/19 Page 38 of 57

2626 Daoph o Sireel Mobile Alexania 36626

ACCOUNT NUMBER	UPON RECEIPT	MDSE/SERV AMOUNT
0.00	GASIEUDGET AMOUNT	TOTAL AMOUNT QUE

PI FASE RETURN THIS PORTION WITH YOUR PAYMENT.
WHICH PAYING IN PERSON-PLEASE BRIKS THIS ENTIRE BILL WITH YOU.

# ուսավիկումութիների անդարկակությունների անու



TAMI HARRISON 507 BOOKER ST MOBILE AL 36604-1065



### վիովակարգիկինիկիայինիկիոնինի

Mobile Gas PO BOX 105001 Atlanta, GA 30348-5001

01 30105359 3 0000001797 4



respond immediately and help please do that otherwise remove, I don't give permission to leave up if I can't log in and manage. I will await your reply. Thank-you.

Regards,

Tami Harrison

---- Forwarded Message ----

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <ip+u1522yo5.aeaqetvql7cpo@support.facebook.com>

Sent: Tuesday, November 29, 2016 9:47 AM Subject: Re: Trademark Report Form

What additional documents you requested? If it is my id I have attached here & bill, if not what documents because I didn't get that email from you. I copy pasted what the other person said. And it does violate my trademarks because I didn't give you permission to use without my consent if I'm not managing it. I'm the rights owner and you see my id I attached you also was taking money from my credit card for ads and that wasn't a problem to do then now don't allow me or anyone else to log in, why?

From: Facebook <ip+u1522yo5.aeaqetvql7cpo@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Monday, November 28, 2016 5:02 PM

Subject: Re: Trademark Report Form

Hi,

Thank you for your response. If you would like to proceed with your Page admin issue, please provide the additional documents requested in our previous email correspondence.

With respect to your trademark claim, based on the information you've provided, we do not see how the content you reported violates your intellectual property rights or other legal rights. Specifically, it is not clear to us that you are the rights owner or are otherwise authorized to submit this report on the rights owner's behalf. Please note that we can only process reports from a rights owner or someone authorized to report on their behalf (e.g., lawyer, agent).

If you believe that this content infringes your rights, please clarify your basis for claiming that the reported content violates your legal rights. If you believe someone else's rights may be infringed by content on the site, you may wish to contact them directly.

Thanks.

Daryl' Intellectual Property Operations Facebook

#### ----Original Message----

All I want is either someone can help me add to the page admin so I can manage it OR just remove it completely all my pages/timeline because if I can't edit update the pages I do not want them up at all and I also own trademarks for now care products this page: facebook.com/footpedicure and here is that info:

http://tmsearch.uspto.gov/bin/showfield?f=doc&state=4802;41u1t.7,2 The Foot System For Smoother Feet by Now Care Products serial # | | 86649093 |

I would prefer to keep them, but all I was getting was ignored or copy paste info. If you send to another team who will respond and help please do that or if nothing can be done just remove all of my pages info because I don't want it up and don't give permission for that if I can't log in and manage. Let me know thank-you. Regards, Tami Harrison

From: Facebook <ip+u1522yo5.aeaqetyql5tte@support.facebook.com>

To: nowcareproducts@vahoo.com

Sent: Friday, November 25, 2016 12:51 PM

Subject: Re: Trademark Report Form

Hi,

Thank you for bringing this matter to our attention. Based on the information you have provided, it sounds like you are trying to make an intellectual property claim, which could result in the permanent removal of content from Facebook. If you wish, we can continue working with you to clarify the basis for your intellectual property claim.

However, it also appears that you are writing to us about a Page admin issue. A different team at Facebook might be able to help you with that issue. If you wish, we can forward your message to that team. Please note that if we do so, we will not act on your intellectual property claim while you are corresponding with that team.

Please clarify whether you would like to proceed with your intellectual property claim or whether you would like us to forward your message so that your Page admin issue can be looked at first. Either way, we'll be happy to follow up.

Thanks.

Orlando Intellectual Property Operations Facebook

Did you receive this email in error? Please let us know: <a href="https://fb.me/20Gk6gDxCCWby9F">https://fb.me/20Gk6gDxCCWby9F</a>

---Original Message---

From: nowcareproducts@yahoo.com

To:

Subject: Trademark Report Form

To be sure you're in the right place, what best describes your issue?: I found content which I believe violates my trademark

Your name (name and surname): Tami Harrison

Please provide a link to your organization or client's official online presence:

https://www.facebook.com/seedvolagetech

Mailing address: PO BOX 66032 Mobile, AI 36660

Phone number: 213-787-6134

Email: nowcareproducts@yahoo.com

Confirm your email address: nowcareproducts@yahoo.com

Who owns the trademark?: Me

Name of the rights owner: Tami Harrison

What is your trademark?: Seed Volage Tech Corporation

Where is your trademark registered?: Alabama

What is your trademark registration number (if applicable)?: 366 - 976

Which categories of goods and/or services are covered by your registration?: The name and page contents are owned by me

If possible, please provide a link (URL) leading directly to your trademark registration.: <a href="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&place=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&place=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="http://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="https://arcsos.state.al.us/cgi/corpdetail.mbr/detail?corp=366976&page=name&file=&type=ALL&status=ALL&city="https://arcsos.status=al.us/cgi/corpdetail.mbr/detail.m

What type of content are you reporting?: An entire Page, group, or timeline Please describe how you believe this content infringes your trademark: This was my page and I had a worker Tracy Smith making posts and keeping page updated but she no longer works with me and I cant verify her and can use my name if I have to or either delete it if I can't log in. Let me know. Thanks.

Do you agree?: yes

Electronic signature: Tami Harrison

From: Facebook <appeals+u1lyt6at.aeau2xu2nm@support.facebook.com> To: nowcareproducts@yahoo.com

Sent: Friday, November 11, 2016 3:02 PM Subject: Re: Thank you for submitting your ID

Hi,

Thanks for your report. We'll review the information you provided and get back to you

In the meantime, you can review our Community Standards to learn more about what is and isn't allowed on Facebook:

https://www.facebook.com/communitystandards/?ref=CR

We appreciate your patience.

View updates from your Support Inbox: https://fb.me/1G0t98EiSwV9f6u

Thanks,

The Facebook Team

#### Case 5:19-cv-01547-SVK Document 1 Filed 03/25/19 Page 43 of 57

sos.state.al.us/cgi/corpdetail.mbr/detail?

corp=366976&page=name&file=&type=ALL&status=ALL&place=ALL&city=

What type of content are you reporting?: An entire Page, group, or timeline

Please provide links (URLs) leading directly to the specific content you are reporting. Please provide one URL per line.: https://www.facebook.com/weedtrimmer

Please describe how you believe this content infringes your trademark: I sent this information before and the page is still up please remove entire timeline for nowcareproducts.com reference# Complaint #1154009371361394

Do you agree?: yes

Electronic signature: Tami Harrison

----End Original Message----

	info	
From:	Now Care (nowcareproducts@yahoo.com)	
То:	notification+kr4ygqbekmkn@facebookmail.com;	
	Monday, February 20, 2017 10:39 PM	

This page is still up: https://www.facebook.com/weedtrimmer please remove. Thank-you.

- Forwarded Message -

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

Sent: Wednesday, December 7, 2016 4:23 PM Subject: Re: A Message from Facebook

I see you removed my 2 pages footpedicure and Seedvolagetech and I also want the entire timeline removed not just those two pages, I had more pages. Please delete everything. A lot of my images on my timeline are copyrighted as well.

https://www.facebook.com/inventionandpatents/

https://www.facebook.com/enddrugwarnow

https://www.facebook.com/samplesanddealsThank-you.

From: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

To: nowcareproducts@yahoo.com

Sent: Wednesday, December 7, 2016 3:53 PM

Subject: A Message from Facebook

Hello.

We removed the following content from Facebook because we received a report alleging that it infringes or violates the rights of a third party, and/or because we have reason to believe that you're not authorized to represent the subject matter of the content.

Page: Foot Care Products

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 1154009371361394 Rights Owner: Tami Harrison

Email: nowcareproducts@yahoo.com

If an agreement is reached to restore the reported content, please have the complaining

party email us with their consent and include the report number.

To keep your account in good standing, please review all materials you've posted to Facebook and remove any remaining content that may be infringing from your account.

For more information about intellectual property, please visit our Help Center:

https://www.facebook.com/help/370657876338359/

Thanks,

The Facebook Team

Subject:	Fw: info
From:	Now Care (nowcareproducts@yahoo.com)
То:	notification+kr4ygqbekmkn@facebookmail.com;
Date:	Monday, February 20, 2017 10:48 PM

These pages are still up please remove: https://www.facebook.com/handwritingapp/

This page is still up: https://www.facebook.com/weedtrimmer please remove. Thank-you.

---- Forwarded Message ----

From: Now Care <nowcareproducts@yahoo.com>

To: Facebook <notification+kr4yggbekmkn@facebookmail.com>

Sent: Wednesday, December 7, 2016 4:23 PM Subject: Re: A Message from Facebook

I see you removed my 2 pages footpedicure and Seedvolagetech and I also want the entire timeline removed not just those two pages, I had more pages. Please delete everything. A lot of my images on my timeline are copyrighted as well.

https://www.facebook.com/inventionandpatents/

https://www.facebook.com/enddrugwarnow

https://www.facebook.com/samplesanddealsThank-you.

From: Facebook <notification+kr4ygqbekmkn@facebookmail.com>

To: nowcareproducts@yahoo.com

Sent: Wednesday, December 7, 2016 3:53 PM

Subject: A Message from Facebook

Hello,

We removed the following content from Facebook because we received a report alleging that it infringes or violates the rights of a third party, and/or because we have reason to believe that you're not authorized to represent the subject matter of the content.

Page: Foot Care Products

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 1154009371361394 Rights Owner: Tami Harrison Email: nowcareproducts@yahoo.com

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

To keep your account in good standing, please review all materials you've posted to Facebook and remove any remaining content that may be infringing from your account.

For more information about intellectual property, please visit our Help Center:

https://www.facebook.com/help/370657876338359/

Thanks,

The Facebook Team

Subject:	Re: A Message from Facebook
From:	Now Care (nowcareproducts@yahoo.com)
То:	notification+kr4ygqbekmkn@facebookmail.com;
Date:	Monday, February 20, 2017 10:56 PM

These pages are still up please remove: https://www.facebook.com/handwritingapp/

This page is still up: https://www.facebook.com/weedtrimmer please remove. We own those as I submitted proof before. We own trademarks/copyrights for Seed Volage Tech Corporation and Now Care Products.

Thank-you.

From: Facebook <notification+kr4yggbekmkn@facebookmail.com>

To: nowcareproducts@yahoo.com

Sent: Wednesday, December 7, 2016 5:23 PM

Subject: A Message from Facebook

Hello.

We removed the following content from Facebook because we received a report alleging that it infringes or violates the rights of a third party, and/or because we have reason to believe that you're not authorized to represent the subject matter of the content.

Page: Samples Steals And Deals

If you believe that this content should not have been removed from Facebook, you can contact the complaining party directly to resolve your issue:

Report #: 1154009371361394 Rights Owner: Tami Harrison

Email: nowcareproducts@yahoo.com

If an agreement is reached to restore the reported content, please have the complaining party email us with their consent and include the report number.

To keep your account in good standing, please review all materials you've posted to Facebook and remove any remaining content that may be infringing from your account.

For more information about intellectual property, please visit our Help Center:

https://www.facebook.com/help/370657876338359/

Thanks,

The Facebook Team



## Alabama Secretary of State

Seed Volage Tech Corporation		
Entity ID Number	366 - 976	
Entity Type	Domestic Corporation	
Principal Address 507 BOOKER STREET MOBILE, AL 36604		
Principal Mailing Address	507 BOOKER STREET MOBILE, AL 36604	
Status	Exists	
Place of Formation	Mobile County	
Formation Date	6-27-2016	
Registered Agent Name	HARRISON, TAMI	
Registered Office Street Address	507 BOOKER STREET MOBILE, AL 36604	
Registered Office Mailing Address	507 BOOKER STREET MOBILE, AL 36604	
Nature of Business TO CONDUCT BUSINESS.		
Capital Authorized	950000	
Capital Paid In		
	Incorporators	
Incorporator Name	HARRISON, TAMI	
Incorporator Street Address	507 BOOKER STREET MOBILE, AL 36604	
Incorporator Mailing Address	507 BOOKER STREET MOBILE, AL 36604	
	Transactions	
Transaction Date	Date 7-15-2016	
Miscellaneous Filing Entry	New Entity Effective 06-27-2016 11:17	
Scanned Documents		
	Purchase Document Copies	
Document Date / Type / Pages	7-15-2016 Certificate of Formation 4 pgs.	

New Search

Just go ahead and delete everything and make sure you delete our credit card information from your system and all of our business pages. We will use twitter instead. Permanently delete it. Thank-you.

From: Facebook <appeals+u1lyt6at.aeau2xu2nm@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Friday, November 11, 2016 5:14 PM Subject: Re: Thank you for submitting your ID

Hi,

Thanks for contacting us. It looks like we couldn't confirm that you're the owner of this account because you didn't provide ID with information that matches the details on this account. Please send us a photo or scan of an ID or other documents that match the info on this profile and include:

- Your name
- Your photo
- Your date of birth

When you send us a photo or scan of your ID, please cover up any personal information we don't need to confirm that you're the account owner (ex: credit card number, Social Security number).

If you don't have an ID, you can use other documents to confirm that you own this account. To learn more about what documents you can send, please visit the Help Center and check out options 2 and 3:

https://www.facebook.com/help/159096464162185/?ref=cr

Keep in mind that once we confirm that the account belongs to you, we'll delete the photo or scan of your ID or documents from our servers.

We apologize for any inconvenience, and hope to hear from you soon so we can help.

View updates from your Support Inbox: https://fb.me/1FWpR3IUIBINEGU

Thanks,

Facebook

----Original Message----

From: nowcareproducts@yahoo.com

To:

Subject: Thank you for submitting your ID

-mail.	DAMAGORA	ひとへんい いっさってのご	vohoo oom
Lilian.	HUWLate	products@	valiuu.cuiii

--End Original Message---End Original Message-

Subject:	Re: Thank you for submitting your ID	
From:	Now Care (nowcareproducts@yahoo.com)	
To:	appeals+u1lyt6at.aeau2xu2nnx56@support.facebook.com;	
Date:	Saturday, November 12, 2016 7:36 PM	

Tracy Smith was a worker/contractor that no longer works for Now Care Products so I will not have that information. So if I can't log in and take care of the pages I rather them to be deleted or I will contact an attorney if you leave it up without us being able to log in. Why would we keep it up? Let me know what you are going to do. Thank-you.

From: Facebook <appeals+u1lvt6at.aeau2xu2nnx56@support.facebook.com>

To: nowcareproducts@yahoo.com

Sent: Saturday, November 12, 2016 11:01 AM Subject: Re: Thank you for submitting your ID

Hi.

We can't help you with your request until we receive an ID or other document that we can use to confirm that you're the owner of this account. The document should include your name, photo and date of birth that matches the info on this profile.

Please visit the Help Center to learn about the types of IDs and documents we can use to confirm your identity:

https://www.facebook.com/help/159096464162185/?ref=cr

When you have your ID or documents ready, you can reply to this email with a scanned copy or photo of them. Please cover up any personal information we don't need to confirm your name (ex: credit card number, Social Security number). We'll just need to see your name, photo, and date of birth that matches the information on your profile.

View updates from your Support Inbox: https://fb.me/2bBVWjKtf7pcK06

Thanks,

Jesse Community Operations Facebook

----Original Message----

From: Now Care (nowcareproducts@yahoo.com)

To: Facebook

Subject: Re: Thank you for submitting your ID

## EXHIBIT D

- Amanda Carmichael <amanda@startengine.com> 07/27/16 at 12:53 PM
- support@seedvolagetech.com Hide CC
- Aimee Savran

Hi Tami,

Thank you for submitting your campaign for consideration on StartEngine. StartEngine has determined that we will not be moving forward with Seed Volage Tech at this time.

There are several objective criteria StartEngine evaluates in our green-light process, and ultimately each item needs to be met. Right now, we believe Seed Volage Tech should improve their social community size

- · What's New
- Discover Investments
- Raise Capital
- Launch an ICO

NEW

Start Engine helps companies crowdfund and raise money

- My Company
- My Investments

My TradesAccount

• Sign In

No results for ""

View all investments



### StartEngine

Your chance to fund the future.

Large OPO

West Hollywood, CA

Financial Services

Accepting International Investment

### StartEngine

Your chance to fund the future.

Large OPO
West Hollywood, CA
Financial Services
Accepting International Investment

2,980

Investors

\$4,006,530.00

Raised of \$500 - \$5M goal

Overview Team Updates Comments Share

https://www.startengine.com/