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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2019 JUL -8 AM 11:18

DORA BROWN

19 CV CV 6328

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

COMPLAINT

AUTOMATIC
WORDPRESS.COM
BLUEHOST
TWITTER

Do you want a jury trial?
 Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

Federal Question

Diversity of Citizenship ✓

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

FRAUD

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, DORA BROWN, is a citizen of the State of
(Plaintiff's name)

NEW YORK
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, AUTOMATIC, is incorporated under the laws of
the State of CALIFORNIA

and has its principal place of business in the State of CALIFORNIA

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in CALIFORNIA

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

DORA I BROWN
First Name Middle Initial Last Name

17 EAST 28 STREET #236
Street Address

NEW YORK NEW YORK 10016
County, City State Zip Code

(646) 629 8002 dorabrown520@gmail.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: AUTOMATTIC Inc
 First Name Last Name
 "Pioneer of fine blogging and site-building since 2005."
 Current Job Title (or other identifying information)
6029 60 29th Street #343
 Current Work Address (or other address where defendant may be served)
San Francisco California 94110
 County, City State Zip Code

Defendant 2: WORDPRESS.COM
 First Name Last Name
Systems Software
 Current Job Title (or other identifying information)
60 29th Street #343
 Current Work Address (or other address where defendant may be served)
San Francisco California 94110
 County, City State Zip Code

Defendant 3: BLUEHOST
 First Name Last Name
Endurance International Group
 Current Job Title (or other identifying information)
10 Corporate Drive
 Current Work Address (or other address where defendant may be served)
Burlington MA 01803
 County, City State Zip Code

Defendant 4:

TWITTER

First Name

Last Name

Current Job Title (or other identifying information)

249 West 17th Street

Current Work Address (or other address where defendant may be served)

New York

New York

10011

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: RESIDENCE 14 EAST 28th ST #236 NY 10016

Date(s) of occurrence: MARCH 2019 earlier SEPT. 2018

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I HAVE A WEBSITE HOSTED ON BLUEHOST. I ALSO HAD A WEBSITE HOSTED ON WORDPRESS.COM AND UPGRADED SITE FROM WORDPRESS.ORG WITH THE DOMAIN NAME EV7.COM. I HAD MOVED MY EV7.COM SITE TO BLUEHOST AND IT WAS A SUBDOMAIN. THE UPGRADED SITE THE TRANSFERRED WAY TRAINING I HAD LEFT ON THE AUTOMATHE WORDPRESS.COM SITE. I INFORMED WORDPRESS.COM THAT I WAS MIGRATING MY THE TRANSFERRED WAY TRAINING SITE TO BLUEHOST AND THE EV7.COM SUBDOMAIN. WHEN I WAS CONTACTED BY ICANN ABOUT THE REGISTRATION OF EV7.COM THE TRANSFERRED WAY TRAINING WHICH I FOUND AUTOMATHE WAS CLAIMING IT WAS THE REGISTRIAR, I FILED A COMPLAINT WITH ICANN, AND INFORMED BLUEHOST THAT I WAS MIGRATING MY SITE TO BLUEHOST AND PAID \$150.00 FOR THE MIGRATION IN MARCH THIS YEAR. I HAD CLOSED THE ICANN CASE BECAUSE I HAD ASSUMED THAT AUTOMATHE AFTER RECVY THE COMPLAINT FROM ICANN HAD DESISTED.

I received notice that the migration I had paid Bluehost Migration Team to do, was not done, instead, they collaborated with Automattic and did irreparable damage to my primary site and between Bluehost and Automattic had allowed users to add themselves to my site. With Tumblr also being part of the mix. The correspondence that will clarify this matter is complex and I expect to see support my assertion that these entities has violated my privacy, attempted to "steal" my life's work of 50 years, and the matter is not yet resolved.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Since the only health issues I have ever estimated which have ended this had me using a Netalight machine and Sarcoidosis a condition that ~~is~~ aggravates and makes one's life hell necessitating the use of NAPROXEN both medications prescribed by my PCP.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

MY WEBSITE both primary and the subdomain plus ~~transferred~~ ~~way~~ ~~time~~ have been compromised and need extensive repair since this is my magnum opus, my life's work, my masterpiece I want the court to order them to pay as much as is allowable since I now ~~can't~~ ~~am~~ ~~to~~ ~~do~~ ~~this~~ ~~is~~ ~~the~~ ~~time~~ I ~~can~~ ~~go~~ ~~to~~ ~~present~~ my life's research and masterpiece. But it needs to be fixed.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

7/8/2019
 Dated _____ Plaintiff's Signature [Signature]

DORA I BROWN
 First Name Middle Initial Last Name

14 ~~East~~ 28 STREET #236
 Street Address

NEW YORK NEW YORK 10016
 County, City State Zip Code

(646) 629-8002 dorabrown@a.gmail.com
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.