

Multiple Documents

Part	Description
1	5 pages
2	Civil Cover Sheet
3	Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KERRY LEWIS, an adult
individual,

Civil Action No. 2:20-cv-1784

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.¹

NOTICE OF REMOVAL

Defendants Google LLC and Alphabet Inc. (unless otherwise specified, together, “Google”), by and through their undersigned counsel, file this Notice of Removal of Case No. GD-20-010995 (the “state action”) in the Court of Common Pleas of Allegheny County, Pennsylvania to the United States District Court for the Western District of Pennsylvania. *See* 28 U.S.C. §§ 1332(a), 1441, and 1446. Plaintiff Kerry Lewis (“Lewis”) filed the state action on October 21, 2020, in the Court of Common Pleas, where the action is now pending. The Complaint was served via certified mail on or around October 30, 2020. (Copies of all docket filings, and process, pleadings, and Orders served upon Google—including the Complaint—are filed with this Notice, attached as Exhibit A and made a part hereof.) Google states as follows as grounds for removal of the state action:

¹ Plaintiff misidentified “Google LLC” as “Google Inc.” in the caption. (*See* Ex. A, Cmpl.)

1. The state action is a civil action alleging “willful, wanton, and wrongful” conduct by Google in connection with an alleged failure to “remove [a] fraudulent review” of Lewis’s business. (Cmpl. ¶¶ 12-13.)

2. The United States District Court for the Western District Court of Pennsylvania has jurisdiction by reason of the complete diversity of citizenship of the parties. *See* 28 U.S.C. § 1332(a)(1).

3. Lewis is an individual “with professional offices” in “Pittsburgh, Allegheny County, Pennsylvania,” (Cmpl. ¶ 1), and, upon information and belief, a citizen of the Commonwealth of Pennsylvania.

4. Google LLC is wholly-owned by XXVI Holdings Inc., which is incorporated in Delaware with a principal place of business located in Mountain View, California. Google LLC is therefore a citizen of Delaware and California for diversity purposes. *See Zambelli Fireworks Mfg. Co. v. Wood*, 592 F.3d 412, 418 (3d Cir. 2010) (“[T]he citizenship of an LLC is determined by the citizenship of each of its members.”); 28 U.S.C. § 1332(c)(1).

5. Alphabet Inc. is incorporated in Delaware with its principal place of business located in Mountain View, California. It is therefore a citizen of Delaware and California for diversity purposes. *See* 28 U.S.C. § 1332(c)(1).

6. The Complaint demands “judgment against the Defendants . . . in an amount in excess of the Arbitration limits of the Court of Common Pleas of Allegheny County, Pennsylvania.” (Cmpl. p. 3.) Lewis does not seek a specific amount of damages—in Pennsylvania, “the State practice . . . does not permit demand for a specific sum.” 28 U.S.C. § 1446(c)(2)(A)(ii); *see* Pa. R.C.P. No. 1021(b). Lewis’s damages allegations nonetheless satisfy the jurisdictional requirement for purposes of removal. He alleges “damage to Plaintiff’s

professional reputation” and “great injury to Plaintiff’s good name, credit and reputation, all of which has been to his great financial loss and damage.” (Cmpl. ¶ 13.) As such, it cannot be said that “it appears to a legal certainty that the plaintiff *cannot* recover more than the jurisdictional amount of \$75,000.” *See Hawkins v. Wells Fargo Bank N.A.*, No. 2:12-cv-64, 2012 WL 12892224, *2 (W.D. Pa., July 12, 2012) (quoting *Frederico v. Home Depot*, 507 F.3d 188, 195 (3d Cir. 2007)). The matter in controversy therefore exceeds \$75,000.00, exclusive of interest and costs, and the Court has jurisdiction under 28 U.S.C. § 1332(a)(1).

7. The United States District Court for the Western District of Pennsylvania, Pittsburgh Division, is the appropriate Federal District Court for removal purposes because the action is currently filed in the Court of Common Pleas of Allegheny County. *See* 28 U.S.C. §§ 1441(a), 1446(a); LCvR 3.

8. This Notice of Removal is timely, *see* 28 U.S.C. § 1446(b)(1), and all defendants join in this Notice.

9. Copies of this Notice will be filed with the Department of Court Records of the Court of Common Pleas of Allegheny County, Pennsylvania, and served upon Lewis, as required by 28 U.S.C. § 1446(d).

TUCKER ARENSBERG, P.C.

/s/ Ryan James

Ryan James

Pa. I.D. #82799

J. Andrew Salemme

Pa. I.D. #298257

1500 One PPG Place

Pittsburgh, PA 15222

(412) 566-1212

rjames@tuckerlaw.com

asalemme@tuckerlaw.com

Attorneys for Defendants

Google LLC and Alphabet Inc.

Dated: November 18, 2020

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served upon the following party via United States mail, first class, postage prepaid, this 18th day of November, 2020:

Kerry Lewis, Esq.
Lewis, Lewis & Reilly
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219

/s/ Ryan James

Ryan James

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Kerry Lewis

(b) County of Residence of First Listed Plaintiff Allegheny (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Kerry Lewis, Lewis, Lewis & Reilly, 1040 Fifth Ave., 1st Floor, Pittsburgh, PA 15219; 412.391.0818

DEFENDANTS

Google, LLC; Alphabet, Inc.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Ryan James, Tucker Arensberg, P.C.

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF, DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Personal Injury, Property Rights, and Tax Suits.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. 1332. Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER Allegh. Co.; GD 20-010995

DATE 11/18/20 SIGNATURE OF ATTORNEY OF RECORD [Signature]

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

JS 44A REVISED June, 2009
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA
THIS CASE DESIGNATION SHEET MUST BE COMPLETED

PART A

This case belongs on the (Erie Johnstown Pittsburgh) calendar.

1. **ERIE CALENDAR** - If cause of action arose in the counties of Crawford, Elk, Erie, Forest, McKean, Venang or Warren, OR any plaintiff or defendant resides in one of said counties.
2. **JOHNSTOWN CALENDAR** - If cause of action arose in the counties of Bedford, Blair, Cambria, Clearfield or Somerset OR any plaintiff or defendant resides in one of said counties.
3. Complete if on **ERIE CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.
4. Complete if on **JOHNSTOWN CALENDAR**: I certify that the cause of action arose in _____ County and that the _____ resides in _____ County.

PART B (You are to check ONE of the following)

1. This case is related to Number 20-010995 Allegh. Co. . Short Caption Lewis v. Google, Inc.
2. This case is not related to a pending or terminated case.

DEFINITIONS OF RELATED CASES:

CIVIL: Civil cases are deemed related when a case filed relates to property included in another suit or involves the same issues of fact or it grows out of the same transactions as another suit or involves the validity or infringement of a patent involved in another suit
EMINENT DOMAIN: Cases in contiguous closely located groups and in common ownership groups which will lend themselves to consolidation for trial shall be deemed related.
HABEAS CORPUS & CIVIL RIGHTS: All habeas corpus petitions filed by the same individual shall be deemed related. All pro se Civil Rights actions by the same individual shall be deemed related.

PART C

I. CIVIL CATEGORY (Select the applicable category).

1. Antitrust and Securities Act Cases
2. Labor-Management Relations
3. Habeas corpus
4. Civil Rights
5. Patent, Copyright, and Trademark
6. Eminent Domain
7. All other federal question cases
8. All personal and property damage tort cases, including maritime, FELA, Jones Act, Motor vehicle, products liability, assault, defamation, malicious prosecution, and false arrest
9. Insurance indemnity, contract and other diversity cases.
10. Government Collection Cases (shall include HEW Student Loans (Education), V A Overpayment, Overpayment of Social Security, Enlistment Overpayment (Army, Navy, etc.), HUD Loans, GAO Loans (Misc. Types), Mortgage Foreclosures, SBA Loans, Civil Penalties and Coal Mine Penalty and Reclamation Fees.)

I certify that to the best of my knowledge the entries on this Case Designation Sheet are true and correct

/s/ Ryan James

Date: 11/18/20

ATTORNEY AT LAW

NOTE: ALL SECTIONS OF BOTH FORMS MUST BE COMPLETED BEFORE CASE CAN BE PROCESSED.

Home > Search > Case Search

Case Details - GD-20-010995

Lewis vs Google Inc. etal

Filing Date:
10/21/2020
Filing Time:
04:16:13
Related Cases:
Consolidated Cases:
Judge:
No Judge
Amount In Dispute:
\$ 0
Case Type:
Other Tort
Court Type:
General Docket
Current Status:
Praeipce for Appearance
Jury Requested:
Y

Parties Count : 5

--Litigants--

Search



LName	FName	MI	Type	Address	Initial Service Completion	Attorney
Lewis	Kerry		Plaintiff	1040 Fifth Avenue 1st Floor Pittsburgh PA 15219	--	J. Kerrington Lewis
Google Inc.			Defendant	6425 Penn Avenue Pittsburgh PA 15206	--	Ryan James
Alphabet Inc.			Defendant	1600 Amphitheatre Parkway Mountain View CA 94043	--	Ryan James

Showing 1 to 3 of 3 rows

--Attorney--

Search



LName	FName	MI	Type	Address	Phone
Lewis	J.	Kerrington	Plaintiff's Attorney	1040 Fifth Ave Suite 100 Pittsburgh PA 15219	4123910818
James	Ryan		Attorney		--

Showing 1 to 2 of 2 rows

--Non Litigants--

Search



No matching records found

Top

Docket Entries Count : 2

Search



Filing Date	Docket Type	Docket Text	Filing Party	Original Document	Redacted Document
11/16/2020	Praeipce for Appearance	Filed on Behalf of Defendants	Ryan James	Document 2	Document 2
10/21/2020	Complaint		Kerry Lewis	Document 1	Document 1

Showing 1 to 2 of 2 rows

Event Schedule Count : 0

Search



No matching records found

Services Count : 0 Complete Service History

Search



No matching records found

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS, an adult
individual,

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.

CIVIL DIVISION

NO.: G.D. 20-

COMPLAINT IN CIVIL ACTION

Filed on behalf of:

PLAINTIFF, KERRY LEWIS
PRO SE

LEWIS, LEWIS & REILLY
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219-6268

Phone: (412) 391-0818
Facsimile: (412) 391-8144

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
)	
Plaintiff,)	
)	
vs.)	NO.: G.D. 20-
)	
GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	Jury Trial Demanded

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by an attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**LAWYER REFERRAL SERVICE
ALLEGHENY COUNTY BAR ASSOCIATION
400 KOPPERS BUILDING
436 7TH AVENUE, 3RD FLOOR
PITTSBURGH, PA 15219**

TELEPHONE NO.: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
)	
Plaintiff,)	
)	
vs.)	NO.: G.D. 20-
)	
GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	

COMPLAINT IN CIVIL ACTION

AND NOW, comes the Plaintiff, Kerry Lewis, Pro Se, and files the within Complaint in Civil Action, and in support thereof, avers as follows:

1. Plaintiff is Kerry Lewis, an adult individual, with professional offices located at 1040 Fifth Avenue, 1st Floor, Pittsburgh, Allegheny County, Pennsylvania 15219.
2. The Defendant Google, Inc. is a corporation with professional offices located at 6425 Penn Avenue, Pittsburgh, Allegheny County, Pennsylvania 15206, hereinafter referred to as "Google."
3. The Defendant Alphabet, Inc. is a corporation which is a holding company for various corporations including Google, with professional offices located at 1600 Amphitheatre Parkway, Mountain View, California 94043.
4. Plaintiff is a lawyer and a member of the Pennsylvania law firm of Lewis, Lewis & Reilly which maintains a website known as "LewisLewisReilly.com."
5. Plaintiff also maintains a website known as KerryLewisLaw.com.

6. At all times material to this Complaint, the Defendants jointly operated an Internet search engine which it markets as “Google” and provides search capabilities for Internet users.
7. Defendants jointly operate a regular and systematic search engine that provides Internet users access to millions of business web sites including but not limited to multi-national corporations, small business, individual merchants, and professional service providers and publishes and disseminates reviews regarding these businesses.
8. The reviews are usually short, written statements, authored by individuals, which describes their respective interaction with a particular business or service provider. The reviews can be positive, neutral, or negative depending upon the individual’s opinion regarding their experience. These reviews are posted by the individual on Google’s platform and Google incorporates the review so that it appears on the search results of that particular business to which it relates.
9. Defendant Google has published a “review” by a “Lolo Mosby” in which she reports a horrible experience interacting with Plaintiff in his professional capacity. Her review describes Plaintiff as “failing to show up for a hearing” and claims Plaintiff “ruined her life.” (See Exhibit “A” attached.)
10. Plaintiff has advised Defendants that the review is a fraud, that Plaintiff has never had a client named “Lolo Mosby,” there is no court record or other document which would support Ms. Mosby’s claim that Plaintiff represented her, and despite Plaintiff’s request to Defendants to investigate this fraud, Defendants have refused to take any action and continue to maintain and disseminate the fake review in connection with Internet searches of the Plaintiff conducted on its platform.

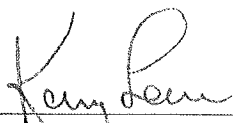
11. Defendants have refused to remove the review notwithstanding Plaintiff has advised and requested Defendants to do so numerous times over the past year.
12. Defendants' conduct is willful, wanton, and wrongful in that it has systematically refused to respond to the Plaintiff's requests, objections, and pleas regarding the verifiable means at Defendants' disposal to confirm that both "Lolo Mosby" and the review that she posted are a fraud. Further, there are no documents, court records or other documents which in any way suggest the Plaintiff has ever represented the person identified as "Lolo Mosby," the alleged author of the bogus review.
13. The Defendants' failure to conduct an investigation and remove the fraudulent review has caused damage to Plaintiff's professional reputation and resulted in great injury to Plaintiff's good name, credit and reputation, all of which has been to his great financial loss and damage.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, in an amount in excess of the Arbitration limits of the Court of Common Pleas of Allegheny County, Pennsylvania.

JURY TRIAL DEMANDED.

Respectfully submitted,

LEWIS, LEWIS & REILLY

By: 
Kerry Lewis, Esquire
Plaintiff, Pro Se

Kerry Lewis Law

1040 Fifth Ave #1, Pittsburgh, PA

Write a review

4.2

1 2 3 4 5 6 7 8 9 10 Next

5 reviews

Sort by: Most relevant

15219, Pittsburgh, PA - From your Internet address - Use precise location - Learn more

Help Send feedback Privacy Terms

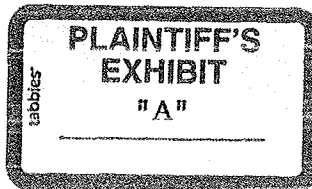


Lolo Mosby

Local Guide · 197 reviews · 295 photos

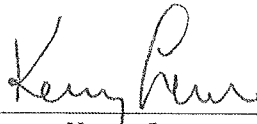
6 months ago

I wish I could rate a zero he lied to me said he would work my case probono but when I had my hearing and really needed him most he failed me never attended court with me never helped me at all just gave me tons of broken promises.... Totally felt alone and neglected following this... Thanks for nothing and thanks for ruining my life Kerry Lewis... Smh



VERIFICATION

I verify that the statements and averments made in the foregoing **Complaint in Civil Action** are true and correct. I understand that false statements herein are made subject to the penalties of 18 PA C.S. §4904 relating to unsworn falsification to authorities.

x 
Kerry Lewis

Dated: 10/21/2020

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS,

Plaintiff,

v.

GOOGLE, INC.; and ALPHABET, INC.,

Defendants.

CIVIL DIVISION

No. GD 20-010995

**PRAECIPE FOR ENTRY OF
APPEARANCE**

Filed on Behalf of Defendants

Counsel of Record for These Parties:

Ryan James
Pa I.D. #82799

J. Andrew Salemme
Pa. I.D. #298257

TUCKER ARENSBERG, P.C.
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212
rjames@tuckerlaw.com
asalemme@tuckerlaw.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS,

CIVIL DIVISION

Plaintiff,

No. GD 20-010995

v.

GOOGLE, INC.; ALPHABET, INC.

Defendants.

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE DEPARTMENT OF COURT RECORDS:

Kindly enter the appearance of Ryan James, J. Andrew Salemme, and the law firm of Tucker Arensberg, P.C., on behalf of the Defendants in the above-referenced action.

TUCKER ARENSBERG, P.C.

/s/ Ryan James

Ryan James

Pa. I.D. #82799

J. Andrew Salemme

Pa. I.D. #298257

1500 One PPG Place

Pittsburgh, PA 15222

(412) 566-1212

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Tucker Arensberg, P.C.

Signature: /s/ Ryan James

Name: Ryan James

Attorney No.: #82799

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Praecipe for Entry of Appearance was served upon the following party by United States mail, first class, postage prepaid, this 16th day of November, 2020:

Kerry Lewis, Esquire
Lewis, Lewis & Reilly
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219

/s/ Ryan James

Ryan James

CERTIFIED MAIL

FORM 2 SHERIFF
IF NOT CALLED FOR IN 10 DAYS RETURN TO
WILLIAM P MULLEN SHERIFF
ROOM 111 COURTHOUSE
436 GRANT STREET
PITTSBURGH PA 15219-2496



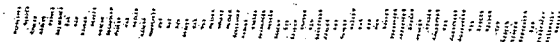
91 7199 9991 7035 8714 07



U.S. POSTAGE PITNEY BOWES
ZIP 15219 \$005.71⁰
02 40
0000648379 OCT. 27. 2020

*Alphabet Inc.
1600 Amphitheatre Dr.
Mountainview, CA 94043*

9404381351 0909



NOTICE OF SUIT TO SHERIFF OF ALLEGHENY CO.

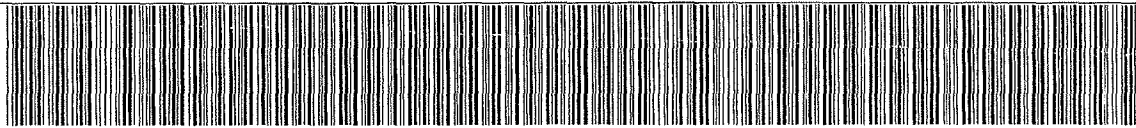
You are hereby notified that on 10/21/2020
 a COMPLAINT has been filed in this case
 and you are required to serve the same on or before the
11/20/2020

Michael McGeever, Director
 Department of Court Records

COMPLAINT IN CIVIL ACTION

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

Plaintiff(s) <p style="text-align: center;">Lewis, Kerry</p>	Case Number: <p style="text-align: center;">GD-20-010995</p> Type of pleading: <p style="text-align: center;">Complaint</p> Filed on behalf of: <p style="text-align: center;">Lewis Kerry</p> <p style="text-align: center;"><u>Lewis Kerrington J.</u></p> (Name of filing party)
Defendant(s) <p style="text-align: center;">Google Inc.,</p> <p style="text-align: center;">Alphabet Inc.,</p>	VS <input checked="" type="checkbox"/> Counsel of Record <input type="checkbox"/> Individual, If Pro Se Name, Address and Telephone Number: <p style="text-align: center;">Lewis Kerrington J.</p> <p style="text-align: center;">1040 Fifth Ave</p> <p style="text-align: center;">Suite 100</p> <p style="text-align: center;">Pittsburgh, PA, 15219</p> <p style="text-align: center;">412 3910818</p> Attorney's State ID: 15575



Michael McGeever, Director, Department of Court Records

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KERRY LEWIS, an adult
individual,

Plaintiff,

vs.

GOOGLE, INC., a corporation, and
ALPHABET, INC., a corporation,

Defendants.

CIVIL DIVISION

NO.: G.D. 20- 010995

COMPLAINT IN CIVIL ACTION

Filed on behalf of:

PLAINTIFF, KERRY LEWIS
PRO SE

LEWIS, LEWIS & REILLY
1040 Fifth Avenue, 1st Floor
Pittsburgh, PA 15219-6268

Phone: (412) 391-0818
Facsimile: (412) 391-8144

JURY TRIAL DEMANDED

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
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Plaintiff,)	
)	
vs.)	NO.: G.D. 20-010995
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GOOGLE, INC., a corporation, and)	
ALPHABET, INC., a corporation,)	
)	
Defendants.)	Jury Trial Demanded

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YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERRAL SERVICE
ALLEGHENY COUNTY BAR ASSOCIATION
400 KOPPERS BUILDING
436 7TH AVENUE, 3RD FLOOR
PITTSBURGH, PA 15219

TELEPHONE NO.: (412) 261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
CIVIL DIVISION

KERRY LEWIS, an adult)	
individual,)	
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Plaintiff,)	
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vs.)	NO.: G.D. 20- 010995
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Defendants.)	

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2. The Defendant Google, Inc. is a corporation with professional offices located at 6425 Penn Avenue, Pittsburgh, Allegheny County, Pennsylvania 15206, hereinafter referred to as "Google."
3. The Defendant Alphabet, Inc. is a corporation which is a holding company for various corporations including Google, with professional offices located at 1600 Amphitheatre Parkway, Mountain View, California 94043.
4. Plaintiff is a lawyer and a member of the Pennsylvania law firm of Lewis, Lewis & Reilly which maintains a website known as "LewisLewisReilly.com."
5. Plaintiff also maintains a website known as KerryLewisLaw.com.

6. At all times material to this Complaint, the Defendants jointly operated an Internet search engine which it markets as “Google” and provides search capabilities for Internet users.
7. Defendants jointly operate a regular and systematic search engine that provides Internet users access to millions of business web sites including but not limited to multi-national corporations, small business, individual merchants, and professional service providers and publishes and disseminates reviews regarding these businesses.
8. The reviews are usually short, written statements, authored by individuals, which describes their respective interaction with a particular business or service provider. The reviews can be positive, neutral, or negative depending upon the individual’s opinion regarding their experience. These reviews are posted by the individual on Google’s platform and Google incorporates the review so that it appears on the search results of that particular business to which it relates.
9. Defendant Google has published a “review” by a “Lolo Mosby” in which she reports a horrible experience interacting with Plaintiff in his professional capacity. Her review describes Plaintiff as “failing to show up for a hearing” and claims Plaintiff “ruined her life.” (See Exhibit “A” attached.)
10. Plaintiff has advised Defendants that the review is a fraud, that Plaintiff has never had a client named “Lolo Mosby,” there is no court record or other document which would support Ms. Mosby’s claim that Plaintiff represented her, and despite Plaintiff’s request to Defendants to investigate this fraud, Defendants have refused to take any action and continue to maintain and disseminate the fake review in connection with Internet searches of the Plaintiff conducted on its platform.

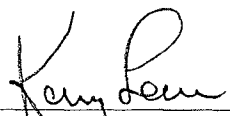
11. Defendants have refused to remove the review notwithstanding Plaintiff has advised and requested Defendants to do so numerous times over the past year.
12. Defendants' conduct is willful, wanton, and wrongful in that it has systematically refused to respond to the Plaintiff's requests, objections, and pleas regarding the verifiable means at Defendants' disposal to confirm that both "Lolo Mosby" and the review that she posted are a fraud. Further, there are no documents, court records or other documents which in any way suggest the Plaintiff has ever represented the person identified as "Lolo Mosby," the alleged author of the bogus review.
13. The Defendants' failure to conduct an investigation and remove the fraudulent review has caused damage to Plaintiff's professional reputation and resulted in great injury to Plaintiff's good name, credit and reputation, all of which has been to his great financial loss and damage.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, in an amount in excess of the Arbitration limits of the Court of Common Pleas of Allegheny County, Pennsylvania.

JURY TRIAL DEMANDED.

Respectfully submitted,

LEWIS, LEWIS & REILLY

By: 
Kerry Lewis, Esquire
Plaintiff, Pro Se

Kerry Lewis Law

1040 Fifth Ave #1, Pittsburgh, PA

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4.2

1 2 3 4 5 6 7 8 9 10

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5 reviews

Sort by: Most relevant

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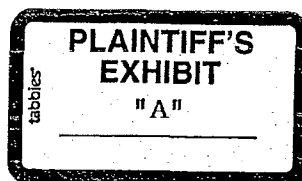
Lolo Mosby

Local Guide · 197 reviews · 295 photos

6 months ago

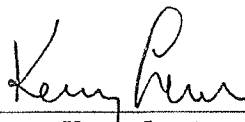
I wish I could rate a zero he lied to me said he would work my case probono but when I had my hearing and really needed him most he failed me never attended court with me never helped me at all just gave me tons of broken promises.... Totally felt alone and neglected following this... Thanks for nothing and thanks for ruining my life Kerry Lewis... Smh

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VERIFICATION

I verify that the statements and averments made in the foregoing **Complaint in Civil Action** are true and correct. I understand that false statements herein are made subject to the penalties of 18 PA C.S. §4904 relating to unsworn falsification to authorities.

x 
_____ *Kerry Lewis*

Dated: 10/21/2020

10/30/20

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