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<b>DON'T TREAD ON US, LLC VS TWITTER, INC.</b>	
<b>Local Case Number:</b> 2023-001009-CA-01	<b>Filing Date:</b> 01/20/2023
<b>State Case Number:</b> 132023CA001009000001	<b>Judicial Section:</b> CA15
<b>Consolidated Case No.:</b> N/A	<b>Case Type:</b> Contract & Indebtedness
<b>Case Status:</b> OPEN	

☰ Related Cases

Total Of Related Cases: 0 +

👤 Parties

Total Of Parties: 2 +

👉 Hearing Details

Total Of Hearings: 0 +

📄 Dockets

Total Of Dockets: 8 -

Number	Date	Book/Page	Docket Entry	Event Type	Comments
8	02/07/2023		Service Returned	Event	TWITTER, INC.
7	02/01/2023		Receipt:	Event	RECEIPT#:3140215 AMT PAID:\$10.00 NAME:BECK, ELIZABETH LEE BECK & LEE TRIAL LAWYERS 8306 MILLS DR. #248 MIAMI FL 33183 COMMENT: ALLOCATION CODE QUANTITY UNIT AMOUNT 3139-SUMMONS ISSUE FEE 1 \$10.00 \$10.00 TENDER TYPE:EFILINGS TENDER AMT:\$10.00 RECEIPT DATE:02/01/2023 REGISTER#:314 CASHIER:EFILINGUSER
	01/31/2023		20 Day Summons Issued	Service	
6	01/31/2023		ESummons 20 Day Issued	Event	RE: INDEX # 5. Parties: Twitter Inc.
5	01/31/2023		(M) 20 Day (C) Summons (Sub) Received	Event	
4	01/24/2023		Receipt:	Event	RECEIPT#:3100046 AMT PAID:\$401.00 NAME:JARED H BECK (ESQ) BECK & LEE TRIAL LAWYERS 8306 MILLS DR. #248 MIAMI FL 33183 COMMENT: ALLOCATION CODE QUANTITY UNIT AMOUNT 3100-CIRCUIT FILING FEE 1 \$401.00 \$401.00 TENDER TYPE:EFILINGS TENDEF AMT:\$401.00 RECEIPT DATE:01/24/2023 REGISTER#:310 CASHIER:EFILINGUSER



Number	Date	Book/Page	Docket Entry	Event Type	Comments
2	01/20/2023		Complaint	Event	
1	01/20/2023		Civil Cover Sheet - Claim Amount	Event	

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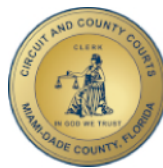
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**Luis G. Montaldo**  
 Clerk Ad Interim

Miami-Dade County  
 Clerk of the Courts

73 W. Flagler Street  
 Miami, Florida 33130

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**FORM 1.997. CIVIL COVER SHEET**

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

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**I. CASE STYLE**

IN THE CIRCUIT/COUNTY COURT OF THE ELEVENTH JUDICIAL CIRCUIT,  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Don't Tread on Us, LLC  
Plaintiff

Case # \_\_\_\_\_  
Judge \_\_\_\_\_

vs.

Twitter, Inc.  
Defendant

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**II. AMOUNT OF CLAIM**

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- \$8,000 or less
- \$8,001 - \$30,000
- \$30,001- \$50,000
- \$50,001- \$75,000
- \$75,001 - \$100,000
- over \$100,000.00

**III. TYPE OF CASE** (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

## **CIRCUIT CIVIL**

- Condominium
- Contracts and indebtedness
- Eminent domain
- Auto negligence
- Negligence—other
  - Business governance
  - Business torts
  - Environmental/Toxic tort
  - Third party indemnification
  - Construction defect
  - Mass tort
  - Negligent security
  - Nursing home negligence
  - Premises liability—commercial
  - Premises liability—residential
- Products liability
- Real Property/Mortgage foreclosure
  - Commercial foreclosure
  - Homestead residential foreclosure
  - Non-homestead residential foreclosure
  - Other real property actions
- Professional malpractice
  - Malpractice—business
  - Malpractice—medical
  - Malpractice—other professional
- Other
  - Antitrust/Trade regulation
  - Business transactions
  - Constitutional challenge—statute or ordinance
  - Constitutional challenge—proposed amendment
  - Corporate trusts
  - Discrimination—employment or other
  - Insurance claims
  - Intellectual property
  - Libel/Slander
  - Shareholder derivative action
  - Securities litigation
  - Trade secrets
  - Trust litigation

## **COUNTY CIVIL**

- Small Claims up to \$8,000
- Civil
- Real property/Mortgage foreclosure

- Replevins
- Evictions
  - Residential Evictions
  - Non-residential Evictions
- Other civil (non-monetary)

**COMPLEX BUSINESS COURT**

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes  No

**IV. REMEDIES SOUGHT (check all that apply):**

- Monetary;
- Nonmonetary declaratory or injunctive relief;
- Punitive

**V. NUMBER OF CAUSES OF ACTION: [ ]**

(Specify)

1

**VI. IS THIS CASE A CLASS ACTION LAWSUIT?**

- yes
- no

**VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?**

- no
- yes If “yes,” list all related cases by name, case number, and court.

**VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?**

- yes
- no

**IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?**

- yes
- no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Jared Beck  
Attorney or party

Fla. Bar # 20695  
(Bar # if attorney)

Jared Beck  
(type or print name)

01/20/2023  
Date

IN THE CIRCUIT COURT OF THE  
ELEVENTH JUDICIAL CIRCUIT, IN  
AND FOR MIAMI-DADE COUNTY,  
FLORIDA

CIVIL DIVISION

CASE NO.

DON'T TREAD ON US, LLC, a Florida  
limited liability company,

Plaintiff,

v.

TWITTER, INC., a Delaware corporation,

Defendant.

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**COMPLAINT AND DEMAND FOR JURY TRIAL**



Plaintiff, DON'T TREAD ON US, LLC (“Plaintiff”), by and through undersigned counsel, hereby sues Defendant, TWITTER, INC. (“Defendant” or “Twitter”), and alleges the following:

**GENERAL ALLEGATIONS OF FACT**

1. On October 27, 2022, billionaire Elon Musk acquired social media service Twitter. Shortly thereafter, Musk explained his purchase of the “digital town square” was

motivated by concerns that Twitter was increasingly suppressing free speech. Upon naming himself CEO, Musk promptly restored several high-profile accounts that had been suspended, including former President Donald Trump, the Babylon Bee, Andrew Tate, and Project Veritas. On November 24, 2022, after conducting a user poll, Musk offered **“a general amnesty to suspended accounts, provided that they have not broken the law or engaged in egregious spam[.]”** Musk tweeted, **“The people have spoken. Amnesty begins next week. Vox Populi, Vox Dei.”**

2. In addition to unsuspending accounts and granting general amnesty, Musk’s agenda as owner and CEO of Twitter has revealed the extraordinary extent of censorship and speech suppression engaged in by the company’s prior management. To this end, on December 2, 2022, Musk, through various journalists, began releasing the Twitter Files. Published in installments, the Twitter Files have exposed intense coordination between Twitter and various government agencies including the FBI, CIA, and Department of Defense as well as the Democratic National Committee (“DNC”) to censor discourse on the platform around various public issues including the 2020 presidential election, the Hunter Biden laptop controversy, and Covid-19. As one of the Twitter Files journalists, Matt Taibbi, tweeted on January 3, 2023, in connection with a request by Democratic congressman Adam Schiff to ban journalist Paul Sperry, Twitter “received an astonishing variety of requests from officials asking for individuals they didn’t like to be banned.”

3. Bafflingly, however, while Twitter’s new policy has resulted in the restoration of numerous accounts, many of which, like Sperry’s, were targeted for censorship due to the expression of views critical of the Democratic Party or its candidates, two of the most obvious

victims of Twitter’s censorship campaign on behalf of the DNC have yet to be restored: Jared H. Beck (“Mr. Beck”) and Elizabeth Lee Beck (“Mrs. Beck”).

4. Mr. and Mrs. Beck are married attorneys who have been practicing civil litigation in Miami, Florida through their law office, Beck & Lee Trial Lawyers (“Beck & Lee”), since 2007. They are graduates of Harvard and Yale Law Schools, respectively. Before starting Beck & Lee, Mr. Beck practiced at Quinn Emanuel in Los Angeles and Morgan Lewis & Bockius in Miami. Mrs. Beck worked for Quinn Emanuel in Los Angeles and Coffey Burlington in Miami. Beck & Lee’s practice runs the gamut of civil matters, including complex business disputes, real estate litigation, medical malpractice lawsuits, and nationwide antitrust and consumer class actions.

5. Beck & Lee initially built its reputation by successfully litigating hundreds of claims on behalf of real estate investors arising out of the Great Recession of 2007-09 and the associated real estate market crash. Several of those claims involved the abandoned Trump International Hotel & Tower project in Fort Lauderdale, which resulted in a jury trial in Broward County state court against Donald Trump in 2014. Beck & Lee’s litigation against Trump later garnered intense national and international media attention during his 2016 presidential campaign due to an angry sexist tirade by Trump against Mrs. Beck at his 2011 deposition, whereupon a red-faced Trump stormed out of the room. *See* Jeremy Diamond, *Lawyer: Donald Trump called me ‘disgusting’ for request to pump breast milk*, CNN (July 29, 2015), available at <https://www.cnn.com/2015/07/29/politics/trump-breast-pump-statement/index.html> (last visited Jan. 1, 2023).

6. Mrs. Beck was interviewed regarding Trump’s conduct by, among others, the New York Times, CNN, and MSNBC. Portions of her CNN interview were replayed by the



DNC at its July 2016 national convention as part of a video presentation titled “Trump in His Own Words: Women in the Workplace.” (The presentation is available on YouTube at <https://www.youtube.com/watch?v=9dQyauLUGQs> (last visited Jan. 1, 2023)). (Trump swiftly lashed out against Mrs. Beck, maligning her in the press as a “tough killer in Miami,” “whack-job,” “crazy,” “vicious, horrible person,” and falsely asserting that “she wanted to breast-pump in front of me.”).<sup>1</sup>

7. In an ironic twist, at the very moment the DNC was projecting Mrs. Beck’s personal experience with Trump at its national convention in Philadelphia to persuade voters to elect Hillary Clinton, Beck & Lee was battling the DNC in a federal courtroom in Fort Lauderdale on behalf of supporters of Clinton’s principal challenger for the Democratic nomination, Bernie Sanders. At the time, Mr. and Mrs. Beck were ardent supporters of Sanders and donors to his campaign. On June 28, 2016, just under a month before the convention, Beck & Lee filed a class action on behalf of 120 named Sanders supporters. The lawsuit, which named as defendants the DNC’s body corporate and chairwoman Deborah Wasserman Schultz, asserted that the DNC and Wasserman Schultz had violated the DNC’s charter obligation to “maintain impartiality and evenhandedness during the Democratic Party nominating process.” Art. 5, § 4 of the Charter of the Democratic Party of the United States. The legal claims were based on the DNC’s internal documents – the authenticity of which the DNC has never contested, and which were released into the public domain by Guccifer 2.0 and later Wikileaks –

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<sup>1</sup> See David Martosko, *EXCLUSIVE: Donald Trump hammers ‘whack-job’ attorney who once tried to pump breast milk while he gave a legal deposition, saying he ‘knocked her out of the box’ on Twitter*, DailyMail.com (July 29, 2015), available at <https://www.dailymail.co.uk/news/article-3179223/Donald-Trump-hammers-whack-job-attorney-tried-pump-breast-milk-gave-legal-deposition-saying-knocked-box-Twitter.html> (last visited Aug. 5, 2021); *Donald Trump: Elizabeth Beck is a ‘horrible person,’* CNN.com (July 29, 2015), available at <https://www.cnn.com/videos/politics/2015/07/29/donald-trump-elizabeth-beck-dana-bash-interview.cnn> (last visited Jan. 3, 2023).

that show, beyond dispute, that the DNC favored and devoted considerable resources to Clinton's campaign for the Democratic presidential nomination while undermining Sanders. In the immediate aftermath of the WikiLeaks release, Wasserman Schultz and three additional DNC officers resigned.

8. The "DNC Fraud Lawsuit," as it became known on social media and in mainstream and alternative news publications, was ultimately dismissed based on lack of standing, a decision upheld by the Eleventh Circuit in a 29-page published opinion from which the U.S. Supreme Court denied certiorari relief. *See Wilding v. DNC Servs. Corp.*, 941 F.3d 1116 (11th Cir. 2019), *cert. denied by Wilding v. DNC Servs. Corp.*, 140 S.Ct. (2020). While it did not result in a positive judgment for the plaintiffs, the case did achieve a large measure of success in other respects. First, during the district court proceedings, the plaintiffs obtained a critical admission from the DNC in open court when the defendants' lead counsel acknowledged under questioning from Judge William Zloch that his clients believed they had the legal right to rig the primary elections. *See Wilding v. DNC Servs. Corp.*, Transcript of Motion Hearing (Apr. 25, 2017) at 36:21-25 (Counsel for DNC: "[W]e could have voluntarily decided that, Look, we're gonna go into back rooms like they used to and smoke cigars and pick the candidate that way. That's not the way it was done. But they could have. **And that would have also been their right.**" (emphasis added)). Judge Zloch took note of this shocking admission in his opinion dismissing the case. *See Wilding v. DNC Servs. Corp.*, 2017 WL 6345492, \*5 (S.D. Fla. Aug. 25, 2017) ("The Court does not accept this trivialization of the DNC's governing principles. While it may be true in the abstract that the DNC has the right to have its delegates 'go into back rooms like they used to and smoke cigars and pick the candidate that way,' [] the DNC, through its charter, has committed itself to a higher principle." (citation omitted)).

9. Second, at least in part due to its success in revealing the depth of the DNC's disregard for its own charter obligation, the DNC Fraud Lawsuit inspired a vigorous social media discourse surrounding the issue of election integrity, including on Facebook and Twitter, frequently centered on the hashtag #DNCFraudLawsuit, and anticipating, by several years, the now-notorious issues arising out of the 2020 presidential election. One of the United Kingdom's newspapers of record, The Guardian, took note of Beck & Lee's deployment of social media in aid of their David v. Goliath battle, including the divulgement of threats to the safety of plaintiffs' counsel and other participants in the DNC Fraud Lawsuit. *See James Williams, Oath Keepers militia will attend Portland 'free speech' rally, says leader, The Guardian* (June 4, 2017) ("A Miami law firm, Beck and Lee, is suing the DNC over its treatment of Bernie Sanders during the Democratic primary last year. The firm is run by a husband and wife team, Jared and Elizabeth Lee Beck. Jared Beck has used his Twitter account to demand closer investigation of the murder of a DNC staffer, Seth Rich, which has become the subject of rightwing conspiracy theories. Elizabeth Beck recently complained about death threats on Twitter.") *available at* <https://www.theguardian.com/us-news/2017/jun/03/oath-keepers-militia-portland-free-speech-rally> (last visited Jan. 10, 2023).

10. Beck & Lee's use of social media was especially vital to the advocacy of their clients' cause, given the extraordinary extent to which coverage of the DNC Fraud Lawsuit was suppressed by the mainstream news. *See Paul Rosenberg, What You Don't Know Can Hurt You: The 10 News Stories Most Ignored By the Mainstream Media, Willamette Week* (Oct. 11, 2017), *available at* <https://www.wweek.com/news/2017/10/11/what-you-dont-know-can-hurt-you-the-10-news-stories-most-ignored-by-the-mainstream-media/> (last visited Jan. 10, 2023) ("A key story about 2016 election has mostly been ignored by the media—a class action lawsuit alleging

that the Democratic National Committee broke legally binding neutrality agreements in the Democratic primaries by strategizing to make Hillary Clinton the nominee before a single vote was cast.”).

11. However, in January 2019, a vital component of Beck & Lee’s social media advocacy on behalf of its clients, Mr. and Mrs. Beck’s Twitter accounts (Twitter handles @jaredbeck and @eleebeck, respectively) – which at the time had over 30,000 followers combined – were permanently suspended. As reported in *Disobedient Media*, at the time of Mr. Beck’s suspension, he had recently “openly mocked the presidential bid of Kamala Harris. He has been far from the only voice to raise concerns regarding Harris’s candidacy.” Elizabeth Vos, *Twitter Suspends Jared Beck, Attorney For Plaintiffs In DNC Lawsuit*, *Disobedient Media* (Jan. 30, 2019) available at <https://web.archive.org/web/20190130221942/https://disobedientmedia.com/2019/01/twitter-suspends-jared-beck-attorney-for-plaintiffs-in-dnc-fraud-lawsuit/>

12. It is hardly surprising that criticism of Kamala Harris’s candidacy was the trigger that ultimately brought down the censorious wrath of the DNC on Beck & Lee. At the time of Mr. Beck’s suspension, Harris’s former press secretary, Nick Pacilio, was a senior communications manager at Twitter. See Joseph Wulfsohn, *Former Kamala Harris press secretary is top Twitter communications official, announced removal of Trump clip*, *Fox News* (Aug. 12, 2020) available at <https://www.foxnews.com/media/kamala-harris-nick-pacilio-twitter-communications-officer>.

13. Several days later, Mrs. Beck’s Twitter account was permanently suspended. Mr. and Mrs. Beck’s accounts have remained permanently suspended continuously until the present.

14. Regardless of whether Twitter had the contractual and/or statutory right to suspend Mr. and Mrs. Beck's Twitter accounts at the time, the general amnesty announced by Twitter's CEO on November 24, 2022, applies to them because Mr. and Mrs. Beck have never broken the law or engaged in egregious spam with their Twitter accounts, nor have they even been alleged to have done so. Instead, they were suspended for engaging in political speech antagonistic to the establishment Democratic Party interests that largely directed Twitter's censorship policies prior to Musk's takeover, as Musk's own actions as CFO have revealed.

15. Nonetheless, despite several requests for the reinstatement of their accounts made to Twitter's outside counsel, Mr. and Mrs. Beck have remained suspended. As a result, they continue to be excluded from the digital town square, subjected to unwarranted attacks on their reputation and character with no ability to respond, and have been and continue to be significantly damaged in the ability to advocate for their clients in their chosen profession. Moreover, the public sphere has been deprived of the voices of two tenacious advocates on a range of important political and social issues, of which election integrity is just one example. There is no legitimate reason for why Mr. and Mrs. Beck's accounts should not be restored under Twitter's general amnesty policy, and no rationale has ever been supplied.

### **JURISDICTION AND VENUE**

16. This is an action for damages and injunctive relief that exceed the value of \$50,000.00, exclusive of interest, court costs, and attorneys' fees.

17. Venue is proper in this County, where a substantial part of the events relevant to this action took place and where Defendant has targeted its conduct. Furthermore, Plaintiff is a resident of this County.

**PARTIES**

18. Plaintiff, Don't Tread On Us, LLC is a Florida limited liability company based in Miami, Florida. Plaintiff is the assignee of all rights held by Jared H. Beck and Elizabeth Lee Beck pursuant to their respective contractual relationships with Twitter.

19. Defendant, Twitter Inc. is a Delaware corporation headquartered in San Francisco, California.

**CAUSE OF ACTION**

**(Breach of Contract)**

20. Plaintiff re-alleges paragraphs 1 through 19 above as if fully set forth herein.

21. Both Jared Beck and Elizabeth Lee Beck have valid and enforceable contracts with Twitter.

22. The contracts with Twitter allow Twitter the right to revise or modify their terms.

23. On November 24, 2022, Twitter modified the terms of its contracts with Jared Beck and Elizabeth Lee Beck when it provided, through its CEO, "a general amnesty to suspended accounts, provided that they have not broken the law or engaged in egregious spam[.]"

24. Despite the fact neither Mr. Beck nor Mrs. Beck have ever broken the law or engaged in egregious spam with their Twitter accounts, Twitter has failed to unsuspend Mr. Beck's account or Mrs. Beck's account, thus materially breaching its contracts with them.

25. Twitter's breach is the proximate cause of damages to Mr. and Mrs. Beck.

26. As the assignee of Mr. and Mrs. Beck's contractual rights with Twitter, Plaintiff has standing to sue Twitter for damages and injunctive relief.

WHEREFORE, Plaintiff Don't Tread On Us, LLC prays for judgment against Defendant Twitter, Inc. for damages, injunctive relief, prejudgment and post-judgment interest, court costs, and all other relief as may be necessary and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury in this action on all issues so triable.

DATED: January 20, 2023

RESPECTFULLY SUBMITTED,

/s/ Jared H. Beck

By: Jared H. Beck

**BECK & LEE TRIAL LAWYERS**

JARED H. BECK

Florida Bar No. 20695

ELIZABETH LEE BECK

Florida Bar No. 20697

8306 Mills Drive #248

Miami, Florida 33183

Telephone: (305) 234-2060

Facsimile: (786) 664-3334

jared@beckandlee.com

elizabeth@beckandlee.com

Counsel for Plaintiff

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CIVIL DIVISION	<b>CIVIL ACTION SUMMONS</b> Personal Service on a Natural Person (En Español al Dorso) (Français Au Verso)	CASE NUMBER <b>2023-001009-CA-01</b>
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PLAINTIFF(S)  DON'T TREAD ON US, LLC	vs. DEFENDANT(S)  TWITTER, INC.	CLOCK IN
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To Defendant:  <b>TWITTER, INC.</b>	Address:  <b>CT CORPORATION SYSTEM</b> <b>1200 SOUTH PINE ISLAND ROAD</b> <b>PLANTATION, FL 33324</b>
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A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the Clerk of this court. A phone call will not protect you; your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court, located at:

Dade County Courthouse  
 Clerk of Courts  
 Room 138  
 73 West Flagler Street  
 Miami, Florida 33130

Additional Court locations are printed on the back of this form.

You must also mail or take a copy of your written responses to the "Plaintiff/Plaintiff's Attorney" named below.

Plaintiff/Plaintiff's Attorney  Elizabeth Lee Beck, Esq.	Address:  <b>BECK &amp; LEE TRIAL LAWYERS</b> 8306 Mills Dr., #248 Miami, FL 33183
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TO EACH SHERIFF OF THE STATE OF FLORIDA: You are commanded to serve this Summons and a copy of the Complaint of this lawsuit on the above named defendant.

CLERK OF COURTS	BY: _____ COURT SEAL	DATE
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**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 días contados a partir del recibo de esta notificación para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número de caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff Attorney" (Demandante o Abogado del Demandante).

**IMPORTANT**

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent., et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones)

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

**ADDITIONAL COURT FACILITY LOCATIONS**

Joseph Caleb Center (20)  
Room 205  
5400 N.W. 22 Avenue  
Miami, Florida 33142

Coral Gables District Court (25)  
2801 Salzedo Street  
Coral Gables, Florida 33134

Hialeah District Court (21)  
55 S.W. 4 Avenue  
Hialeah, Florida 33010

South Dade Government Center (26)  
10710 S.W. 211 Street  
Miami, Florida 33189

North Dade Justice Center (23)  
Room 100  
15555 Biscayne Blvd.  
Miami, Florida 33161

Homestead District Court (27)  
715 N.E. 1 Road  
Homestead, Florida 33030

Miami Beach District Court (24)  
Room 224  
1130 Washington Avenue  
Miami Beach, Florida 33139

Sweetwater Branch Office  
500 S.W. 109th Avenue  
Sweetwater, Florida 33174

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CIVIL DIVISION	<b>CIVIL ACTION SUMMONS</b>  Personal Service on a Natural Person (En Español al Dorso) (Français Au Verso)	CASE NUMBER  <b>2023-001009-CA-01</b>
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PLAINTIFF(S)  DON'T TREAD ON US, LLC	vs. DEFENDANT(S)  TWITTER, INC.	CLOCK IN
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To Defendant:  <b>TWITTER, INC.</b>	Address:  <b>CT CORPORATION SYSTEM 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324</b>
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A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the Clerk of this court. A phone call will not protect you; your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court, located at:


Dade County Courthouse  
Clerk of Courts  
Room 138  
73 West Flagler Street  
Miami, Florida 33130

Additional Court locations are printed on the back of this form.

You must also mail or take a copy of your written responses to the "Plaintiff/Plaintiff's Attorney" named below.

Plaintiff/Plaintiff's Attorney  Elizabeth Lee Beck, Esq.	Address:  <b>BECK &amp; LEE TRIAL LAWYERS 8306 Mills Dr., #248 Miami, FL 33183</b>
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TO EACH SHERIFF OF THE STATE OF FLORIDA: You are commanded to serve this Summons and a copy of the Complaint of this lawsuit on the above named defendant.

Luis G. Montaldo, CLERK AD INTERIM CLERK OF COURTS	BY: <u>217043</u> <i>Luis G. Montaldo</i>		DATE 1/31/2023
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**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 días contados a partir del recibo de esta notificación para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número de caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff Attorney" (Demandante o Abogado del Demandante).

**IMPORTANT**

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent., et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones)

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**ADDITIONAL COURT FACILITY LOCATIONS**

Joseph Caleb Center (20)  
Room 205  
5400 N.W. 22 Avenue  
Miami, Florida 33142

Coral Gables District Court (25)  
2801 Salzedo Street  
Coral Gables, Florida 33134

Hialeah District Court (21)  
55 S.W. 4 Avenue  
Hialeah, Florida 33010

South Dade Government Center (26)  
10710 S.W. 211 Street  
Miami, Florida 33189

North Dade Justice Center (23)  
Room 100  
15555 Biscayne Blvd.  
Miami, Florida 33161

Homestead District Court (27)  
715 N.E. 1 Road  
Homestead, Florida 33030

Miami Beach District Court (24)  
Room 224  
1130 Washington Avenue  
Miami Beach, Florida 33139

Sweetwater Branch Office  
500 S.W. 109th Avenue  
Sweetwater, Florida 33174

## VERIFIED RETURN OF SERVICE

State of Florida

County of Miami-Dade

Circuit Court

Case Number: 2023-001009-CA-01

Plaintiff:

**DON'T TREAD ON US. LLC**

vs.

Defendant:

**TWITTER, INC**

For:

Elizabeth Lee Beck  
BECK & LEE BUSINESS TRIAL LAWYERS  
12485 Sw 137th Avenue  
#205  
Miami, FL 33186

Received by C. ZIRKLE on the 6th day of February, 2023 at 3:07 pm to be served on **TWITTER, INC. CT CORPORATION SYSTEM, 1200 SOUTH PINE ISLAND ROAD, PLANTATION, FL 33324.**

I, CHARLES ZIRKLE, do hereby affirm that on the **7th day of February, 2023 at 12:16 pm, I:**

Served the within named **CORPORATION** by delivering a true copy of the **CIVIL ACTION SUMMONS; CIVIL COVER SHEET; COMPLAINT AND DEMAND FOR JURY TRIAL** with date and hour of service endorsed thereon by me to **DONNA MOCH** as employee authorized to accept service for CT CORPORATION SYSTEM registered agent, at the address of: **1200 SOUTH PINE ISLAND ROAD, PLANTATION, FL 33324**, and informed said person of the contents therein, PURSUANT TO F. S. 48.081(3)(a).

I certify that I am over the age of 18, have no interest in the above action, and I am a Special Process Server, in good standing, in the judicial circuit in which the process was served. Under Penalties of perjury, I declare that I have read the forgoing document and that the facts stated in it are true.



CHARLES ZIRKLE  
SPS #110

C. ZIRKLE  
3408 N.W. 68TH CT  
FORT LAUDERDALE, FL 33309  
(754) 422-9788

Our Job Serial Number: CZP-2023000017

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA		
CIVIL DIVISION	<b>CIVIL ACTION SUMMONS</b> Personal Service on a Natural Person (En Español al Dorso) (Français Au Verso)	CASE NUMBER <b>2023-001009-CA-01</b>
PLAINTIFF(S)  DON'T TREAD ON US, LLC	vs. DEFENDANT(S)  TWITTER, INC.	CLOCK IN
To Defendant:  <b>TWITTER, INC.</b>		Address:  <b>CT CORPORATION SYSTEM 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324</b>

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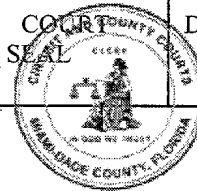
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Luis G. Montaldo, CLERK AD INTERIM CLERK OF COURTS	BY: <u>217043</u> <i>[Signature]</i>	DATE 1/31/2023
--	---	-------------------



*DONNA  
MOCH  
SENIOR CORPORATE  
OPERATIONS MANAGER*

*12:16 PM  
2/7/23*

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