INTRODUCTION

1. Plaintiffs are two American women in their 20s who moved abroad temporarily to teach English to foreign grade school students in Korea and Japan. Defendant John Doe is an unknown individual who has engaged in repeated acts of online harassment, cyber stalking, and racist and offensive rants directed towards the women. His actions include emailing one of the women, her boss and her business associates sexually explicit, racist and disturbing messages, and creating a sexually-explicit website regarding her. In addition, John Doe has taken the women’s photographs and creative writing and republished that copyrighted content on his own website, without the women’s authorization. He has created a website entitled “Korean Dating Bloggers” (he is apparently angry the women have dated Korean men) which displays screenshots of copyrighted materials (photographs and entire pages of creative writing) owned by Plaintiffs. Despite the women’s best efforts to identify him, the identity of John Doe is currently unknown.
2. Defendant Google, Inc. ("Google"), is the host of John Doe’s "Korean Dating Bloggers" website and his GooglePlus profile. Collectively, Plaintiffs have sent Google over 10 written requests to have their copyrighted materials removed from John Doe’s website, in accordance with the Digital Millennium Copyright Act, 17 U.S.C. §§ 101, et seq. (the "DMCA"), both directly and through counsel. Plaintiffs have explored every avenue short of litigation to obtain Google’s compliance with the DMCA, and unfortunately, all of their pleas for assistance have fallen on deaf ears.

3. Google has completely failed to uphold its obligations under U.S. Copyright law and has done nothing but facilitate John Doe’s repeated acts of online harassment, tortious interference, and copyright infringement. Google’s failure to respond to the women’s DMCA notices has resulted in Google’s liability for contributory copyright infringement.

PARTIES

4. Plaintiff Cailin Arena is a recent graduate of Temple University and a U.S. citizen from Philadelphia, Pennsylvania. She is temporarily teaching English as a second language in Japan through Japan’s “JET” program.

5. Plaintiff Patricia McWilliam is a U.S. citizen from Greenville, South Carolina. She is temporarily teaching students in Seoul, South Korea.

6. Defendant John Doe is an unknown individual. On information and belief, John Doe resides in Pennsylvania. Plaintiffs intend to seek immediate and expedited discovery in order to identify John Doe and amend this complaint to include John Doe’s real name.

7. Defendant Google, Inc., is a Delaware corporation with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California, 94043.
8. Upon information and belief, defendant Google maintains offices at the Collaborative Innovation Center, 4720 Forbes Avenue, Lower Level, Pittsburgh, PA 15213.

9. Upon information and belief, Google advertises, solicits clients, and conducts substantial amounts of business in the Commonwealth of Pennsylvania and within this district.

10. To date, Google has refused to remove John Doe’s website, or any of his online content, and has refused to provide any identifying information for John Doe.

**JURISDICTION AND VENUE**

11. This Court has federal question jurisdiction over Plaintiffs’ federal claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

12. This Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367 because those claims are so closely related to the federal claims brought in this complaint as to form part of the same case or controversy.

13. Upon information and belief, defendant John Doe is a resident of Pennsylvania and subject to personal jurisdiction in Pennsylvania.

14. Upon information and belief, Google is subject to personal jurisdiction in the Commonwealth of Pennsylvania because of its systematic contacts with Pennsylvania.

15. Venue is proper in this district under 28 U.S.C. § 1391 (b)(2) because, on information and belief, a substantial part of the events or omissions giving rise to Plaintiffs’ claims occurred in this district.

16. Venue is also proper in this district under 28 U.S.C. §§ 1391(b)(1) and (c) because Google is a corporation whose contacts would be sufficient to subject it to personal
jurisdiction in this district. Moreover, upon information and belief, John Doe resides in Pennsylvania and in this district and is subject to personal jurisdiction here.

**FACTUAL BACKGROUND**

A. **John Doe’s Online Harassment and Cyber Stalking of Cailin Arena**

17. John Doe’s acts of harassment began on January 3, 2012, when he sent an anonymous email to Cailin Arena’s boss through her company website. This email contained links to content that was sexual in nature and stated that Cailin Arena was the author of the content.

18. The same day, John Doe sent Ms. Arena the following message through her company website:

   **Subject:** You are ugly.

   **Message:** Sorry to say but you're an ugly brown something. You probably also smell bad. Have fun in Japan, I hear the radiation isn't bad in Fukushima. Why not buy some vegetables from there for you and your ugly brown children.

   A copy of this email is attached as Exhibit A.

19. The same day, John Doe created a user account at an online, public forum associated with Ms. Arena’s employment. Ms. Arena’s business associates all read and access this online forum. John Doe posted a thread including statements that Ms. Arena was engaging in sexual relationships with members of other races, and implored viewers to visit links to Ms. Arena’s company website and contact her directly about her conduct.

20. On January 8th, 2012, John Doe created a website entitled “Korean Dating Bloggers,” at http://secretlivesexxbloggers.blogspot.com (the “Korean Dating Bloggers” website) and associated the website with the name “Cailin Arena.” John Doe also used Ms. Arena’s name
as a “website tag”\(^1\) for the blog so that it came up prominently in search results for the name “Cailin Arena.”

21. Since July 2010, Ms. Arena has been in a monogamous relationship with a Korean man living in Japan.

22. The Korean Dating Bloggers website is filled with screenshots from two of Ms. Arena’s deleted online blogs, pictures stolen from her GooglePlus account, and links to her work information and contact information. It also includes hateful commentary by John Doe and screenshots from the websites of third parties. The website invites readers to send Ms. Arena hateful commentary at her work email address and identifies her location. The website falsely suggests that Ms. Arena is promiscuous and that Ms. Arena should “give up” her career, and just write a “guide to how to get laid by Korean men.”

23. Disturbingly, the screenshots John Doe posts that are the copyrighted materials of Ms. Arena include materials that have not been posted online by Ms. Arena in a year or more. The website indicates that John Doe has been secretly following all of Ms. Arena’s online activities for at least a year.

24. John Doe also tagged the online content with Ms. Arena’s place of employment – JET in Osaka, Japan, so that it was likely to appear prominently or “high” in Google search results for Ms. Arena’s name and place of employment. He added the website tags: “AJET,”

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\(^1\) Website tags indicate topics that are relevant to the content of a website. These tags are used as markers by search engines when internet users look for content by topic. For example, a tag for “JET” (Ms. Arena’s employer – The Japan Exchange and Teaching Programme) indicates to Google and other search engines that internet users searching for “JET” should consider reading John Doe’s website, because it concerns JET.

25. The same day, John Doe created a Tumblr account with Ms. Arena’s name and job title, pretending to be Ms. Arena. He linked to the offensive Blogspot.com website he had created. Ms. Arena contacted Tumblr following this incident and the account was removed within 24 hours.

26. The same day, John Doe created an AboutEveryone.com listing using Ms. Arena’s name and photograph and including the link to the Blogspot.com website along with other taunting comments regarding “how much trouble she was in.”

27. On or about January 9th, 2012, John Doe created a fake Google plus profile, which is still located at https://plus.google.com/102413284441999134450. He obtained all of the contacts in Ms. Arena’s GooglePlus circle, including a vast variety of her friends, family members, and business associates, and sent all of Ms. Arena’s contacts the link to the offensive “Korean Dating Bloggers” website.

28. John Doe distributed content to Ms. Arena’s family members and colleagues that is infringing, sexually explicit and racially discriminatory, in association with Ms. Arena’s name and contact information.

29. On information and belief, John Doe created the Tumblr blogs and the fictitious Google Plus profile to direct internet traffic to his “Korean Dating Bloggers” website, causing the blog to appear more prominently in Google search results for “Cailin Arena” due to the increase in internet traffic and links to the website.
30. Ms. Arena has taken numerous steps to determine the identify of John Doe, but all of her attempts to confirm his identity have been thwarted by John Doe’s use of anonymizing software and other activities taken to conceal his identity, as well as Google’s refusal to assist her in identifying him without a court order.

31. Accordingly, she only has a strong suspicion as to John Doe’s identity and needs the Court’s assistance to determine his actual identity.

32. Ms. Arena does not know why John Doe has a malicious intent towards her, or what she could have done to prevent these unprovoked attacks.

33. Unfortunately, Ms. Arena is in the process of searching for employment opportunities in Pennsylvania and whenever a recruiter or potential employer Google’s “Cailin Arena,” they see the website “Korean Dating Bloggers” in the first page of search results. See Google Search Results, Exhibit B.

34. Upon information and belief, John Doe resides in Pennsylvania, and is familiar with Cailin Arena and familiar with her efforts to find employment. His actions were taken intentionally for the purpose of harming Ms. Arena personally, as well as her reputation, current employment, and prospective employment opportunities.

35. Moreover, John Doe’s conduct (and Ms. Arena’s inability to confirm John Doe’s identity), has lead to her suffering severe emotional distress, as also intended by John Doe.

B. **John Doe’s Online Harassment and Cyber Stalking of Patricia McWilliam**

36. On January 20, Ms. McWilliam discovered that John Doe had created a website where he posted pictures of her, reproduced pages of text from her personal blog (which is set to “private”), mocked her and “outed” her as the author of the blog.
37. John Doe’s blog post about Ms. McWilliam is also featured on his website “Korean Dating Bloggers.”

38. John Doe calls Ms. McWilliam a “whale” and taunts her for “making out” with Korean men, stating:

“Patri[c]a writes "anonymously" over at Tumblr (but remember kids you're probably not as anonymous as u think) about how she makes out with a lot of guys at a lot of clubs but won't sleep with any of them. She seems really proud of this. Probably because she is really super Christian. But what would her pastor would say if he read her tumblr?

39. John Doe apparently hopes that a wide variety of Patricia McWilliam’s friends, family, and associates will see his website when searching for information regarding Ms. McWilliam. John Doe has associated the website with the name “Patricia McWilliam” and used her name as a “website tag” for the blog so that it came up prominently in search results for the name “Patricia McWilliam.”

40. John Doe also tagged the online content with terms related to Ms. McWilliam’s professional background. Ms. McWilliams is a law school graduate and a graduate of the University of South Carolina. He tagged the site with the following terms: “law,” “law school,” “lawyer,” “Christian,” “kissing,” “making out,” “Patricia,” “McWilliam,” “Patricia McWilliam, University of South Carolina” – so that it was likely to appear high in Google search results for her name and indicate that it was about her.

41. Google searches for “Patricia McWilliam” currently result in John Doe’s website being displayed on the first page of Google’s search results. Ex. B.

42. John Doe’s website also evidences “cyber stalking” of Patricia McWilliam.
43. The Korean Dating Bloggers website is filled with screenshots from Ms. McWilliam's private online blog, a screenshot taken from a YouTube video Ms. McWilliam posted seven years ago and screenshot from a dating profile set up by Ms. McWilliam.

44. John Doe's belief that Ms. McWilliam is a Christian apparently results from the fact that on her dating profile, she states that she self-identifies as Christian and would like someone of the same faith for a romantic partner.

45. His website also includes statements Ms. McWilliam made in the online forum Waygook.org, and invites strangers to find Ms. McWilliam on Facebook or LinkedIn.

46. John Doe's comments indicate that he hopes Ms. McWilliam is caused embarrassment and other resulting harm to her personal and professional relationships. However, as far as Ms. McWilliam knows, she has never met or interacted with John Doe.

47. Unfortunately, Ms. McWilliam is teaching university students this year and whenever a student or colleague Googles "Patricia McWilliam," they see the website "Korean Dating Bloggers" in the first page of search results. See Google Search Results, Exhibit B.

48. Upon information and belief, John Doe is familiar with the fact that Ms. Williams has a professional career and is employed.

49. Ms. McWilliam also does not know why John Doe holds such apparent malice towards her, or what she could have done to prevent these unprovoked attacks.

C. **John Doe's Unauthorized Use of Plaintiffs' Copyrighted Materials**

50. Ms. Arena owns two copyright applications, filed on February 2, 2012, for the photographs she took and the writings she authored (Serial Nos. 1-720315798 and 1-720315865).
51. Ms. McWilliam owns a copyright application, filed February 12, 2012, for the online publications she authored (Serial No. 1-724213741).

52. John Doe continues to publish the content that is the subject of these copyright applications on his “Korean Dating Bloggers” website.

53. All of the copyrighted materials republished by John Doe, of both Ms. McWilliam’s and Ms. Arena’s, is content that Plaintiffs have since deleted and not made available to the public.

54. John Doe saved screenshots of the content and continues to publish it without authorization.

55. John Doe has copied and reproduced entire pages of the women’s writings on his “Korean Dating Bloggers” website.

D. **Google’s Failure to Comply With the DMCA**

56. On January 17th, Ms. Arena sent a DMCA Takedown Notice to Google’s legal department through the online form Google provides for this purpose. On the same day, Google confirmed that they had received the request marked [#947565177]. Ms. Arena’s email chain with Google is attached as Exhibit C.

57. On January 20th, Google responded by asking Ms. Arena for information that she had already provided. Ms. Arena responded again with the same information on the same day. Ex. C.

58. On January 24th, Google finally responded that that under their policy, they do not remove allegedly defamatory, libelous, or slanderous material unless required by a court order.
Ex. C. However, at no point did Ms. Arena allege that the content was “defamatory, libelous or slanderous” in one of her DMCA Takedown requests.

59. Ms. Arena responded the same day, stating that her request was not a request to remove “allegedly defamatory, libelous, or slanderous material,” it was a request to remove copyrighted material under the DMCA. She received no response.

60. On January 26th, Ms. Arena sent an email to Google’s legal department asking for an update on their investigation in regards to the DMCA violation. Ex. C. She also wrote:

“Also, as explained in a prior email, this is a copyright infringement issue and a DMCA Takedown Notice. This is not, as you state, a request to remove ‘allegedly defamatory, libelous, or slanderous material.’ I have not yet received a response. I am merely asking Google to comply with its obligation under the DMCA statute to address clear cases of copyright infringement. I have provided the required notification and evidence that I am the copyright holder, but if you need any other information, obviously, I will provide that too.”

Ex. C.

61. On January 27th, Google informed Ms. Arena that they had decided not to take action against the infringing blog, based on their policies concerning content removal.

62. Ms. Arena submitted two additional take-down notices [No. 955153513, attached as Exhibit D] and [No. 953561258, attached as Exhibit E], providing additional information regarding her copyright ownership and copyright claims, to Google.

63. In desperation, she sent Google and Google’s in-house legal department various pleas for assistance between January 27 and February 3. She attempted to send these requests to all of the contact information for Google’s legal department she could locate, sending requests not only via the automated system, but also to legal-support@google.com, removals@google.com, and legal-civil@google.com.
64. As shown in Exhibit D and Exhibit E, Google’s responses were entirely unhelpful and often nonsensical. In one, Google states: “Google has decided not to take action based on our policies concerning content removal. We would like to assist you, but we don’t currently disclose this information. Should it become publicly available in the future, you may find it on our site at http://www.google.com/about.html. As always, we encourage you to resolve any disputes directly with the owner of the website in question.”

65. At no time did Google give her a reason for its refusal to comply with the DMCA.

66. In a further attempt to avoid having to file a federal complaint to secure Google’s compliance with the DMCA, Ms. Arena engaged counsel to contact Google’s outside counsel, Quinn Emanuel. Her attorney sent emails (and a formal take-down notice) to Quinn Emanuel on January 30, February 1, and February 3. No substantive response was received.

67. Finally, on February 6, Ms. Arena contacted Google directly again and attached copies of her copyright applications with the U.S. Copyright Office. Google continued to refuse to remove the website in accordance with the DMCA.

68. Ms. McWilliam also filed a DMCA take down notice with Google on January 20, 2012. See Correspondence attached as Exhibit F.

69. She also received no substantive response from Google. Ex. F.

E. **Damages Suffered By Plaintiffs as a Result of Defendants’ Unlawful Conduct**

70. Plaintiffs have suffered severe emotional distress as a result of John Doe’s conduct and Google’s repeated refusals to assist them.
71. Ms. Arena’s relationship with her current employer was been harmed due to John Doe’s conduct in emailing her employer. Her relationships with other contacts (including those on GooglePlus and anyone who Google’s “Cailin Arena”) have been similarly harmed.

72. Plaintiffs’ prospective employment opportunities and reputations are suffering ongoing, irreparable harm as a result of John Doe’s conduct.

73. Plaintiffs are fearful that if not identified, John Doe will continue to send the “Korean Dating Bloggers” website to any future employers, in attempt to compromise Plaintiffs’ employment and reputations. Moreover, John Doe’s conduct (and Plaintiffs’ inability to confirm John Doe’s identity despite their best efforts to do so), has lead to Plaintiffs suffering severe emotional distress.

74. Ms. McWilliam has had to miss numerous days away from work and has suffered physical results from the stress of this situation. It has distracted her from work, caused her sleepless nights, and made her feel nauseous and irritable with my friends and co-workers.

75. Ms. Arena has also missed work due to stress, suffered from insomnia, extreme anxiety, distraction, and nausea.

76. Plaintiffs have a right to control copyrighted materials they create and publish online, without the risk that those materials will be used without their authorization and republished elsewhere.

77. Plaintiffs ability to control access to their copyrighted materials, and the use of those materials, has been completely undermined.

78. Much of the copyrighted materials republished by John Doe at the website “Korean Dating Bloggers” is content that Plaintiffs created and published anonymously about a
year ago, but then removed. He saved screenshots of and continues to publish this content without Plaintiffs’ authorization.

79. Google’s refusal to comply with the DMCA has also harmed and continues to harm Plaintiffs.

80. Google’s failure to promptly remove the first instance of infringing material, after being contacted by Ms. Arena, resulted in John Doe using the “Korean Dating Bloggers” site to harass and target Ms. McWilliam.

COUNT I
COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501
AGAINST JOHN DOE

81. The foregoing paragraphs are incorporated by reference as though fully set forth herein.

82. The creative writing and photographs displayed on John Doe’s website is copyrighted material owned by Plaintiffs.

83. Ms. Arena owns a copyright application, filed February 2, 2012, for the photographs she took (Serial No. 1-720315865) and the writings she authored, published, and subsequently removed from the Internet (Serial No. 1-720315798).

84. Ms. McWilliams owns a copyright application, filed February 12, 2012, for the writings she authored, published, and subsequently removed from the Internet (Serial No. 1-724213741).

85. John Doe continues to display these materials without authorization, in violation of 17 U.S.C. § 501 et seq.
86. As a result of John Doe’s infringement of Plaintiffs’ copyrights and exclusive rights under copyright, Plaintiffs are entitled pursuant to 17 U.S.C. § 504 to either disgorgement of profits and recovery of actual damages, or statutory damages. Plaintiffs are further entitled to attorneys’ fees and costs pursuant to 17 U.S.C. § 505.

87. John Doe’s infringement of Plaintiffs’ copyrights has damaged, and is continuing to damage, Plaintiffs in an amount to be determined at trial.

88. John Doe’s conduct is resulting in irreparable damage to Plaintiffs and they have no adequate remedy at law.

89. Accordingly, Plaintiffs seek an order under 17 U.S.C § 502 enjoining John Doe’s copyright infringement.

WHEREFORE, Plaintiffs demand judgment against John Doe for injunctive relief, compensatory damages, punitive damages, interest, attorney’s fees, costs of suit and such other relief as the Court deems equitable and just.

COUNT II
CONTRIBUTORY COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501 AGAINST GOOGLE INC.

90. The foregoing paragraphs are incorporated by reference as though fully set forth herein.

91. Google is the host of Blogspot.com and of John Doe’s website “Korean Dating Bloggers.”

92. U.S. website hosts are required to comply with the DMCA and respond to take down notices submitted under the DMCA.
93. At all times relevant herein, Plaintiffs have been the owner of all rights and interests in the copyrighted works that are the subject of their copyright applications. These copyrighted works consist of material wholly original to Plaintiffs.

94. Plaintiffs notified Google repeatedly that they owned the copyrighted works displayed at “Korean Dating Bloggers.”

95. Additionally, the website “Korean Dating Bloggers” acknowledges that these copyrighted materials are owned by Plaintiffs.

96. Google has directly and/or contributorily infringed upon the Plaintiffs’ copyrights, in knowingly inducing, causing, materially contributing, encouraging, or assisting others to infringe Plaintiffs’ copyrights.

97. Google received notices containing all of the requisite elements under the DMCA statute.

98. Google had the right and ability to control the infringing content that existed on John Doe’s website.

99. Google is liable for infringing Plaintiffs’ copyrighted works as set forth above, by reproducing, copying, publicly displaying, creating derivative works from, and distributing for purposes of trade unauthorized copies of Plaintiffs’ works, in violation of 17 U.S.C. § 101 et seq.

100. Google is liable for refusing to cease and desist from the infringing activity after receiving Plaintiffs’ take down notices. Google’s acts alleged herein were performed without the permission, license, or consent of Plaintiffs.

101. The foregoing acts of infringement by Google have been willful, intentional, and purposeful, in disregard of and with indifference to the rights of Plaintiffs.
102. Plaintiffs are entitled to the maximum statutory damages, pursuant to 17 U.S.C. § 504(e), in the amount of $150,000 with respect to the work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(e). Plaintiffs are also entitled to its attorney’s fees and full costs pursuant to 17 U.S.C. § 505.

103. Google’s conduct is resulting in irreparable damage to Plaintiffs and they have no adequate remedy at law.

WHEREFORE, Plaintiffs demand judgment against Google for injunctive relief, damages (including punitive damages), interest, attorney’s fees and costs of suit and such other relief as the Court deems equitable and just.

**COUNT III**

**TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS AGAINST JOHN DOE**

104. The foregoing paragraphs are incorporated by reference as though fully set forth herein.

105. John Doe created numerous online blogs, forum posts and profiles to direct internet traffic, including Plaintiffs’ coworkers, business associates, and family members, to the harmful materials he posted online.

106. On information and belief, John Doe’s activities were for the purpose of causing harm to Plaintiffs, including causing harm to their existing professional positions and reputations.

107. The direct emails John Doe sent to Ms. Arena’s boss, and posts to the forums associated with Ms. Arena’s professional contacts and work community, were all part of an attempt to compromise and harm Ms. Arena’s professional employment.
108. John Doe also tagged his posts concerning Plaintiffs with their names, and acted to cause his Korean Dating Bloggers website to appear prominently in search results for Plaintiffs’ names.

109. John Doe’s interference was not justified or provoked, but rather he acted with malice and with an intent to cause harm to Plaintiffs’ contractual relationships.

110. Plaintiffs have suffered, and will continue to suffer, and irreparable damage to their reputations and existing contractual relationships (including specifically their relationships with their employers) as a result of John Doe’s intentional interference.

111. John Doe’s tortious conduct has damaged Plaintiffs in an amount to be determined at trial.

112. Plaintiffs have no adequate remedy at law. Accordingly, Plaintiffs seek an order enjoining John Doe’s tortious interference with Plaintiffs’ contractual relationships.

WHEREFORE, Plaintiffs demand judgment against John Doe for injunctive relief, compensatory damages, punitive damages, interest, attorney’s fees and costs of suit and such other relief as the Court deems equitable and just.

COUNT IV

TORTIOUS INTERFERENCE WITH PROSPECTIVE CONTRACTUAL RELATIONS AGAINST JOHN DOE

113. The foregoing paragraphs are incorporated by reference as though fully set forth herein.

114. John Doe’s Korean Dating Bloggers website concerning Plaintiffs has moved to the top of search results for Plaintiffs’ names, interfering with any future employment.
115. On information and belief, John Doe created the numerous online blogs, forum posts and the fictitious Google Plus profile to cause the blog to earn a higher space in search results connected to the Plaintiff’s real names.

116. John Doe intentionally interfered with Plaintiffs’ prospective contractual relationships by creating websites attacking Plaintiffs, as well as sending emails to all of Ms. Arena’s GooglePlus contacts.

117. John Doe’s interference was not justified, but rather he acted with malice and an intent to cause harm to Plaintiffs’ prospective relationships.

118. John Doe knew there was a reasonable likelihood, and, in fact, intended, that his false statements would harm Plaintiffs’s prospective contractual relationships.

119. Plaintiffs have suffered, and will continue to suffer, substantial damage to their reputations and prospective relationships as a result of John Doe’s intentional interference.

120. John Doe’s tortious conduct has damaged Plaintiffs in an amount to be determined at trial.

121. Plaintiffs have no adequate remedy at law and are suffering irreparable harm.

122. Accordingly, Plaintiffs seeks an order enjoining John Doe’s tortious interference with Plaintiffs’ prospective contractual relations.

WHEREFORE, Plaintiffs demand judgment against John Doe for injunctive relief, compensatory damages, punitive damages, interest, attorney’s fees, costs of suit and such other relief as the Court deems equitable and just.
COUNT V
INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS
AGAINST JOHN DOE

123. The foregoing paragraphs are incorporated by reference as though fully set forth herein.

124. John Doe intended to cause harm and inflict emotional distress with his actions, which due to their repeated and anonymous nature, evidence his malicious intent.

125. The anonymous and unprovoked attacks against Plaintiffs described above by John Doe have caused significant emotional distress and have resulted in severe emotional distress to the Plaintiffs.

126. As described above, Ms. Arena has been so distressed she has had to take days away from work, in an already tense situation created by the unwanted contact between John Doe and her colleagues. Ms. McWilliam has similarly suffered nausea, insomnia, distraction and extreme distress as a result of John Doe’s conduct.

WHEREFORE, Plaintiffs demand judgment against John Doe for injunctive relief, compensatory damages, punitive damages, interest, attorney’s fees, costs of suit and such other relief as the Court deems equitable and just.

Respectfully submitted,

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