



Petitioner's daughter on Twitter. The real names and residences of DOES 1-2 are currently unknown.

6. Jurisdiction and venue are both proper in this Court pursuant to 735 ILCS § 5/2-101 and 735 ILCS § 5/2-209(a)(2) and Illinois Supreme Court Rule 224 because (a)(ii) this is a Court in which the action or proceeding might be brought and this is where the acts were felt and directed.

### **RESPONDENT TWITTER**

7. Twitter.com, a for-profit company owned and operator by Twitter Inc., is a social networking platform. Twitter's over 200 million<sup>1</sup> users create user profiles to interact with other users for personal and professional purposes. Users interact with Twitter by sending a Tweet, which is a real time message limited to 140 characters. Twitter users can post Tweets to other users or to a broader audience. Individuals can choose to include personally identifiable information including name, geographic location, photographs, affiliations, websites, and interests.
8. Any member of the public may create an account without being required to give their real names. Specifically, a person only has to provide the following information: (i) Unique Twitter username; (ii) Email address; and (iii) password.
9. These electronic profiles are identified and searchable by an individual's name or Twitter username, called a handle. Anyone with online access may access a Twitter profile's public information.
10. Twitter is accessible by anyone with Internet access, including persons in the State of Illinois and Cook County, Illinois.
11. Twitter users contribute approximately 500 million Tweets being sent per day.<sup>2</sup>
12. All spelling, punctuation, and typographical errors are in the original form.

### **AGAINST JOHN DOE 1: @PROBLEMSCENTURY**

13. On or about May 13, 2013, John Doe 1, using the Twitter Handle, *@problemscentury*, published the following verifiably false statement imputing onto Petitioner's minor daughter unchaste behavior, fornication, and having a loathsome sexually transmitted disease:

**A.A. you gave me herpes. #thanksA.A<sup>3</sup>**

14. Century refers to the Junior High Petitioner's daughter attended.
15. This message was available to the public at large, has been marked as a favorite Tweet of one

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<sup>1</sup> <http://www.businessinsider.com/twitter-total-users-active-and-registered-2013-9>

<sup>2</sup> <https://blog.twitter.com/2013/new-tweets-per-second-record-and-how>

<sup>3</sup> Name has been redacted from the Petition, but the original publication contained the minor's first name and last name.

person. (A true and correct copy of the Tweet is attached hereto and incorporated by reference as Exhibit 1).

16. Twitter suspended this account after receiving the notification.

### **AGAINST JOHN DOE 2: @CENTURYPROBLEM**

17. On or about May 13, 2013, an unknown person, John Doe 2, using the Twitter handle *@centuryproblem*, maliciously intending to injure Petitioner's daughter in her good name and reputation, published the following false and/or injurious statement:

**How many dicks in A.A.'s mouth next year.<sup>4</sup>**

18. Century refers to the Junior High Petitioner's daughter attended.

19. This posting remains published as of the date of filing, and has been marked as a favorite Tweet of one person. (A true and correct copy of the Tweet is attached hereto and incorporated by reference as Exhibit 2).

20. On or about May 14, 2013, an unknown person, John Doe 2 using the Twitter handle *@problemscentury*, published the following statement to provoke or otherwise incite a physical altercation between Petitioner's daughter and a classmate that she prior documented conflicts with:

**Madi and A.A. have no balls they won't fight #scared**

21. This posting remains published as of the date of filing, and has been marked as a favorite Tweet of one person. (A true and correct copy of the Tweet is attached hereto and incorporated by reference as prior Exhibit 2).

### **JOHN DOES ARE STILL UNKNOWN TO PETITIONER**

22. This action involves DOES', each collectively, efforts to harm the Petitioner, to discredit, to disparage, to intimidate, to harass, to torment, to humiliate, and to otherwise damage Petitioner's daughter's reputation.

23. Petitioner has performed various Internet searches relating to the DOES' 1-2 usernames/aliases/pseudonyms in an effort to identify and locate each of them. Despite Petitioner's diligent efforts, she has yet to identify any of the DOES.

24. Respondent, Twitter is in possession of the account information, IP addresses, and other personally identifiable information relating to the Twitter User Accounts of John Doe 1 and John Doe 2.

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<sup>4</sup> Name has been redacted from the Petition, but the original publication contained the minor's first name and last name.

25. Petitioner, as next best friend of A. A., hereby seeks to ascertain the true identities of John Doe(s) from Twitter to seek redress for DOES' tortious conduct.

### NECESSITY OF PETITION

26. Twitter posts and comments are subject to its Terms of Service and Privacy Agreements.
27. Anyone can report offensive, abusive, and/or defamatory content by submitting a Feedback form. The Twitter Team members review these reports. A true and correct copy of the Twitter removal protocol attached hereto as Ex. 3.
28. Petitioner followed the protocol for removing a post as set forth in Exhibit 3 by causing to be sent several electronic messages to Twitter demanding the removal of certain defamatory postings. A true and correct copy of the Twitter takedown requests are attached hereto and incorporated by reference as prior Ex. 3.
29. Petitioner followed the protocol to preserve information based upon the aforementioned Twitter handles according to its Law Enforcement Guidelines.<sup>5</sup> This preservation request was sent via fax to Twitter on November 22, 2013. A true and correct copy of the preservation notice is attached hereto as Ex. 4.
30. Petitioner's efforts to remove the objectionable content have not been wholly successful as many of these offending posts still remain. As such, the statements made on the Twitter continue to harm Petitioner's daughter's reputation in the community.
31. Petitioner is able to demonstrate a cause of action for defamation because:
- a) DOES each and collectively published, or caused to be published, verifiably false statements concerning Petitioner's daughter, which falsely accuse Petitioner's daughter of engaging in adultery/fornication, unchaste behavior, and having a loathsome sexually transmitted disease which are statements that are actionable as defamation per se in Illinois.
  - b) The defamatory statement published by John Doe 1 falsely asserted that Petitioner's minor daughter had a sexually transmitted disease, specifically Herpes.
  - c) The defamatory statement posted by John Doe 2 imputed unchaste and promiscuous behavior onto Petitioner's minor daughter.
  - d) Petitioner has never had or been diagnosed with any venereal disease.
  - e) Petitioner's daughter has not engaged in any adulterous or otherwise unchaste behavior.

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<sup>5</sup> <https://support.twitter.com/articles/41949>

- f) DOES statements, each and collectively, clearly make reference to Petitioner's daughter so there can be no claim that any other person with the same name or a similar name was referred to.
- g) Such statements question the moral turpitude of the Petitioner's daughter.
- h) DOES' statements each and collectively are verifiably false and defamatory.
- i) Petitioner's daughter is a private person.
- j) DOES, each and collectively, knew or reasonably should have known, at the time of publication, that the injurious statements, inferences, and innuendos are inaccurate, misleading, and with a reckless disregard for the truth or falsity of what was stated with the intent and/or knowledge that these statements would be viewed by prospective colleges, school administrators, friends, acquaintances, and/or the public. These statements clearly reveal the malicious, oppressive, and willful nature of DOES' conduct.
- k) DOES acted, each and collectively, with actual malice knowing the falsity of each of their statements, inferences and innuendo, deliberately calculated to harm or destroy Petitioner's daughter's reputation both professionally and personally.
- l) These verifiably false statements of fact were instantly published to Twitter.com's website, and available for the public at large. DOES false statements were, each and collectively, with injurious intent, directed at third parties throughout the Internet.
- m) More specifically, any person with Internet access can perform an online search of Petitioner's daughter's name and easily find the DOES' defamatory statements on Twitter throughout the Internet.
- n) DOES, each and collectively, knew or should have known, that such publications concerning Petitioner would have serious effects on her reputation; that such publication would be cached throughout the Internet; and read and understood by people who read Twitter or perform a Google search for Petitioner's daughter.
- o) As a direct and proximate cause of each DOES' statements, Petitioner's daughter has suffered harm to her personal reputation; has been brought into public scandal and disrepute and held to the contempt, ridicule, and shame with and among, relatives, peers, friends, acquaintances, and others elsewhere.

32. Petitioner is able to demonstrate a cause of action for false light invasion of privacy because DOES' disparaging and untrue statements concerning Petitioner's minor daughter portray her publicly in a false light as someone who is unchaste, who is promiscuous, and who has a loathsome sexually transmitted disease.

- a) This portrayal would be highly offensive to a reasonable person.
- b) This portrayal was done with malice and/or the specific intent to injure Petitioner's daughter.
- c) DOES' false and defamatory statements and communications were each collectively and separately calculated to cause Petitioner's daughter harm both personally and professionally and to invade Petitioner's daughter's privacy rights.
- d) By publishing, disseminating, and/or engaging in the publications of such communications, DOES have falsely represented and intended to create the impression that Petitioner's minor daughter engages in such behavior.
- e) As a direct and proximate cause of each DOES' statements, Petitioner's daughter has suffered harm to her personal reputation; has been brought into public scandal and disrepute and held to the contempt, ridicule, and shame with and among, relatives, peers, friends, acquaintances, and others elsewhere.
- f) Since the DOES each started publishing these false statements, Petitioner's daughter must explain to fellow classmates, friends, and acquaintances that these posts are not true.
- g) Anytime the Petitioner's daughter applies for an organization or activity, she has to contend with the possibility that she will be searched on the Internet and that these malicious publications will taint her academic accomplishments.

**33.** In acting as described above, DOES, each and collectively did not publish these statements in the public concern, but rather, each DOE posted these fictitious statements without consent, legal justification, legitimate cause, or any other legal excuse.

**34.** The false statements posted by DOES were understood and believed by the persons who observed it to convey that meaning.

**35.** Because of the anonymity allowed to users of both Twitter, Petitioner cannot ascertain the identities of the individuals who made the false statements above and must instead seek this information from Respondent.

**36.** As DOES' false postings on Twitter are cached and collected in various repositories disseminated throughout the Internet, DOES' false content is harder to completely remove.

**37.** Petitioner's daughter has suffered, is suffering, and will continue to suffer a loss to her personal reputation, shame, mortification, emotional distress, all to their general and special damages because of DOES' statements, but which Petitioner is informed and believes will exceed \$100,000.00.

**38.** In accordance with Illinois Supreme Court Rule 224, Petitioner requests the Court to enter an

order allowing it to conduct expedited discovery of Respondent to ascertain the identity of any persons allegedly involved in the acts which form the basis of Petitioner's contemplated actions. Immediately obtaining the identity of each John Doe is necessary to stop the ongoing violations discussed above and critical to end the continuing harm to Petitioner's reputation. The verifiably factually false statements will continue to cause Petitioner irreparable harm as well as direct and indirect monetary and non-monetary harm if not stopped.

39. Petitioner seeks discovery from Respondent the following discovery from Respondent: names, physical addresses, Email addresses, IP addresses, and any other identifying information as indicated in the attached draft Orders, related to the Internet posters and injurious statements published using those accounts for the purpose of seeking redress against for these false publications and to remove the publically available defamatory statements that still exist publically on the Internet.

WHEREFORE, Mary Andreolas, as Next Best Friend of minor, A. A. prays that this Court enter an order compelling the expedited discovery requests herein from the Respondent.

Respectfully submitted,

Mary Andreolas  
as Next Best Friend of A. A. , a minor



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By: Gianna Scatchell  
One of Petitioner's Attorneys

Attorney No. 49640  
Gruber-Scatchell  
320 W. Ohio Street, 3W Suite 25  
Chicago, Illinois 60654  
(312) 574-0077  
info@lawfirm.gs

Dated: November 22, 2013

State of Illinois        )  
                                  ) ss.  
County of Cook         )

**VERIFICATION CERTIFICATION**

Under the penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true. 735 ILCS 5/1-109.



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Mary Andreolas

as Next Best Friend of A. A. , a minor

# EXHIBIT 1



**Century Problems**  
@ProblemsCentury



you gave me  
herpes #thanks

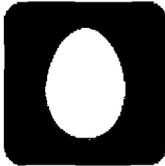
5/13/13, 8:47 PM

1 FAVORITE



Ex 3

# EXHIBIT 2



**Century Truth**  
@CenturyProblem



How many dicks in [REDACTED] mouth next year

5/13/13, 10:46 PM

1 FAVORITE



Reply to Century Truth



Home



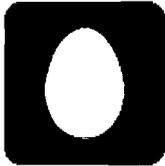
Connect



Discover



Me



**Century Truth**  
@CenturyProblem



Madi and [REDACTED] have no balls they  
won't fight #scared

5/14/13, 3:29 PM



Reply to Century Truth



Home



Connect



Discover



Me

# EXHIBIT 3

Understanding your safety settings

Choosing your experience

Dealing with issues online

Tips

Resources

← Back to Safety & Security

# Online abuse

Being the target of online abuse is not easy to deal with. Knowing the appropriate steps to take to address your situation can help you through the process.

## When to report it?

We've all seen something on the Internet we disagree with or have received unwanted communication. Such behavior does not necessarily constitute online abuse. If you see or receive an @reply you don't like, unfollow and end any communication with that user.

If the behavior continues, it is recommend that you block the user. Blocking will prevent that person from following, see your profile picture on their profile page or in their timeline, and their @replies or mentions will not show in your mentions tab (although these Tweets may still appear in search).

Abusive users often lose interest once they realize that you will not respond. If the user in question is a friend, try addressing the issue offline. If you have had a misunderstanding, it may be possible to clear the matter up face to face or with the help of a trusted individual.

If you continue receiving unwanted, targeted and continuous @replies on Twitter, and feel it constitutes online abuse, consider reporting the behavior to [Twitterhere](#).

## Take threats seriously

If you believe you are in physical danger, contact the local law enforcement authorities who have the tools to address the issue.

- document the violent or abusive messages with print-outs or screenshots
- be as specific as possible about why you are concerned
- provide any context you have around who you believe might be involved, such as evidence of abusive behavior found on other websites
- provide any information regarding previous threats you may have received

You can report the content to Twitter [here](#).

## Reach out to the people you trust

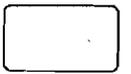
When dealing with negative or hurtful interactions, it can help to turn to family and friends for support and advice. Oftentimes, talking with your relatives or a close friend may help you figure out how you want to handle the situation or let you express your feelings so you can move on. There are many online resources that can help, too:

- Stop Bullying | [@stopbullyinggov](#)
- National Crime Prevention Center on Cyberbullying
- Cyberbullying Research Center
- Connect Safely | [@connectsafely](#)
- UK's Safer Internet Centre | [@UK\\_SIC](#)
- Anti-Bullying Pro | [@antibullyingpro](#)
- National Society for the Prevention of Cruelty to Children | [@NSPCC](#)

## Help others

Trying to figure out how to help someone in such a situation can be daunting. This [Twitter Support article](#) offers some suggestions.

If you see a violent or abusive message directed at someone else, communicate your concern to the recipient and encourage them to contact Twitter and their local authorities.



# I'm reporting an abusive user

Please fill out all the fields below so we can review your report.

For more information and resources on dealing with abusive users both on the internet and on Twitter, please review this article (</articles/15794>).

- How can we help?
- Someone on Twitter is posting my private information.
  - Someone on Twitter is being abusive.
  - Someone on Twitter is sending me violent threats.

If an interaction has gone beyond the point of name calling and you feel as though you may be in danger, contact your local authorities so they can accurately assess the validity of the threat and help you resolve the issue offline.

If someone means you harm, just removing the threatening statements does not make the issue go away.

Removing a violent threat may prove to be difficult for law enforcement if investigation does take place.

If contacted by law enforcement directly, we can work with them and provide the necessary information for their investigation of your issue. You can point local law enforcement to our **Law Enforcement Guidelines** (</articles/41949>).

What username is causing the issue?

Please provide links to the Tweets you are reporting as evidence so that we can investigate. To find the exact link of a Tweet, please review this article (</articles/80586-how-to-link-directly-to-an-individual-tweet>). You'll need to provide at least one direct link to the content you're reporting; more links are helpful to establish patterns.

# Tweet I am reporting

Link to Tweet

It appears that you are reporting the same Tweet more than once. Please report a different Tweet to continue.

Please match up the reported Tweet with the reported specified user.

Where does the information appear?

- In the profile bio
- On the profile photo, header photo, or background image
- Within a Tweet
  - The private information is in the text within the Tweet.
  - The private information is in the photo within the Tweet.
  - The private information is being linked from a URL in the Tweet.

What personal information was posted?

- Home address
- Personal telephone number
- Your email address
- Your financial information
- Other

Please provide further details about the private information posted

Providing this information will help us review your report faster. It will also make it more convenient for you if you decide to involve your local law enforcement. When you are finished with your report, there will be an option for you to print all your information out so you can have it on hand when you talk to law enforcement.

Does the Tweet mention a specific time?

- Yes
- No

Please provide the specific time mentioned

Does the Tweet mention a date?

- Yes
- No

Please provide the specific date mentioned

Does the Tweet mention a place or location?  Yes  No

Please provide the specific place or location mentioned

Does the Tweet mention you or a specific person?  Yes  No

Please provide the name of the person mentioned

[Report another Tweet](#) | [Remove latest Tweet](#)

What are you reporting?  I think the user has multiple accounts they are using to directly @reply me and others.

We will review your report to determine whether the account meets with our criteria for suspension; regardless, please ensure you've blocked the user(s) you are reporting. For more information on how to block users, please review this help page (</entries/18311>).

This user keeps sending me @replies and I don't want to receive them.

We will review your report to determine whether the account meets with our criteria for suspension; regardless, please ensure you've blocked the user(s) you are reporting. For more information on how to block users, please review this help page (</entries/18311>).

This user is saying really offensive things, but is not sending me @replies.

We will review your report to determine whether the account meets with our criteria for suspension; regardless, please ensure you've blocked the user(s) you are reporting. For more information on how to block users, please review this help page (</entries/18311>).

As a general rule, Twitter is a communications platform rather than a content provider and does not mediate content; for additional information, please review this help page (</articles/15794>).

We will review your report to determine whether the account meets with our criteria for suspension; regardless, please ensure you've blocked the user(s) you are reporting. For more information on how to block users, please review this help page (</entries/18311>).

As a general rule, Twitter is a communications platform rather than a content provider and does not mediate content; for additional information, please review this help page (</articles/15794>).

Please note that while you may consider some sensitive information to be private, not all reported content will fall under our private information policy (</articles/20169991>).

Please note that while you may consider some sensitive information to be private, not all reported content will fall under our private information policy (</articles/20169991>).

Does the information posted belong to you?

- Yes, the information posted belongs to me.  
 No, the information posted does not belong to me.

The Twitter Rules state that users may not publish or post other people's private information. However, in order for us to take action, we must receive a report from the person whose information is posted.

If the private information you're reporting is not your own, we will require documentation that you're authorized to act on behalf of the person whose confidential information is posted.

If you are not an authorized representative, but you are in contact with the individual, make sure the individual knows to file a report through our forms. We enforce this policy to prevent false or unauthorized reports.

Can the information posted be found on other sites?

- Yes, the information can be found elsewhere.  
 No, the information can be found only on Twitter.

Did you post the information?

- Yes, I posted the information.  
Information that was voluntarily posted publicly or voluntarily provided in connection with a registered domain or website may not be considered private.  
 No, the information was posted without my consent.

Please note that Twitter can only resolve issues related to content posted on Twitter. If someone else has posted this content on other websites as well, please contact those websites for assistance in removing the information. For more information, please review this article (</articles/15349>).

Information that was voluntarily posted publicly or voluntarily provided in connection with a registered domain or website may not be considered private.

Please note that Twitter can only resolve issues related to content posted on Twitter. If someone else has posted this content on other websites as well, please contact those websites for assistance in removing the information. For more information, please review this article (</articles/15349-why-is-my-twitter-profile-in-google-search>).

We've noticed that the Tweet(s) you are reporting may lack the specificity to meet the criteria of an actionable threat. While we will still fully investigate your issue, we may not take action against the reported user.

If you believe you are in danger, please contact your local authorities as soon as possible. You can point local law enforcement to our Law Enforcement Guidelines (</articles/41949>).

Have you already blocked the person(s) involved?

- Yes  
 No

We recommend that you block users who are intentionally attempting to aggravate you. Blocking prevents the user from following you or replying to you, and can minimize any incentives to persist in their conduct.

Refer to this help page (</articles/117063>) to learn how to block another user.

How long ago did this begin?

- 24 hours ago

You have stated that your issue has happened within the last 24 hours. We will investigate, however, we highly recommend you contact your local law enforcement for immediate assistance.

If contacted by law enforcement directly, we can work with them and provide the necessary information for their investigation of your issue. You can point local law enforcement to our Law Enforcement Guidelines (</articles/41949>).

- Few days ago  
 About a week ago  
 About a month ago  
 More than a month ago

How many times has this happened?

Further description of problem

Please provide as much detail as possible surrounding your issue.

We are unable to accept attachments or screenshots related to your report.  
Please only provide links to exact Tweets or Twitter accounts.

Please read and acknowledge the following statements; making a deliberately false report is a violation of the Twitter Rules and may result in permanent account suspension.

In order to submit, please complete the following good faith statements:

Good faith statements

- I have not posted the information I am reporting anywhere else on the Internet and the information is not otherwise publicly available.
- The information I am reporting belongs to me or the person I represent and is private.

## Signature

Please electronically sign this notice by typing your full name here:

Your full name

- I understand that Twitter may provide third parties, for example the reported user, with details of this report, such as the reported Tweet. Your contact information, like your email address, will not be disclosed.

Twitter username

Your email

This is the email we'll use to contact you. Enter your current address.

Submitting...

Not what you need help with? Choose another topic ([/forms/](#)).

# EXHIBIT 4

Gruber & Scatchell  
ATTORNEYS AT LAW

320 West Ohio, 3W #25  
Chicago, IL 60654

T 312-574 0077-  
F 312-380-0577  
info@lawfirm.gs

[www.lawfirm.gs](http://www.lawfirm.gs)

November 22, 2013

Twitter Inc.  
c/o Trust and Safety  
via facsimile 415-222-9958

RE: LITIGATION HOLD - CASE NO: 2013-L-011483

To whom it may concern:

The above mentioned individuals, including yourself and your corporation, Twitter Inc. (the "Corporation") are now involved in litigation against the above listed parties.

As a result, you must preserve and retain all paper files and electronically stored information that is related to this matter. In the paragraphs below, I have outlined my recommendations for ensuring that all potentially relevant evidence is preserved. I cannot stress enough the importance of taking immediate actions to preserve this information as failure to take adequate steps to collect and preserve evidence, including electronic evidence, could result in server sanctions being imposed by the Court for spoliation of evidence.

I recommend that you take the following steps to ensure that all data, including electronic data, is preserved for the Twitter handles involved in this Petition: *@centuryproblem* and *@problemscentury*.

First, you should agree on one person to take the lead in preserving all information potentially relevant to this matter. This person will ensure that these steps are taken in their entirety, and that steps are not accidentally skipped because someone assumes that one of the others is taking care of it.

Second, you should contact former employees, agents, or other informally connected parties which you believe may have access to relevant information of the Corporation to ensure that they understand the importance of preserving all potentially relevant evidence. You are encouraged to have them contact myself or my partner at 312.574.0077 or at [info@lawfirm.gs](mailto:info@lawfirm.gs) if they need further explanation of their duty to preserve information.

Gruber & Scatchell  
ATTORNEYS AT LAW

320 West Ohio, 3W #25  
Chicago, IL 60654

T 312-574 0077-

F 312-380-0577

[info@lawfirm.gs](mailto:info@lawfirm.gs)

[www.lawfirm.gs](http://www.lawfirm.gs)

Third, you should develop a strategy for preserving all electronic data in your possession including consulting an information technology specialist if necessary. As we discussed, you are required to preserve all relevant electronic data, including, but not limited to, e-mails, electronic documents (such as documents created using Microsoft Word, Excel, PowerPoint, Access and the like); data generated by calendaring, task management and Personal Information Management (PIM) software (such as Microsoft Outlook or Lotus Notes); data created with the use of Personal Data Assistants, Blackberries or similar devices; all data created with the use of document management software; all data created with the use of paper and electronic mail logging and routing software; all internet and Web-browser-generated history files, caches and "cookies" files; all electronic activity logs; and employee, agent, or individuals known to possess accesses e-mail accounts. You must preserve all potentially relevant data, regardless of whether it is contained on business or personal computers, Personal Digital Assistants, Blackberries, cell phones, iPhones, iPads, etc.

Fourth, if you automatically dispose of or recycle digital or paper files, digital backup tapes, optical diskettes, or other storage media (possibly pursuant to a document retention policy), we recommend suspending such program for the time being. We can then discuss which information should be preserved throughout the litigation.

Fifth, if your document retention policy previously resulted in the destruction of electronically stored information that can still be reasonably recovered, please recover this information immediately. If it is possible to recover information for a significant period of time, please contact me to discuss the relevant period of time for recovery.

Once you have had an opportunity to consider the points raised in this letter, please give my firm a call or email at 312.574.0077 or [info@lawfirm.gs](mailto:info@lawfirm.gs). You can also reach my co-counsel's firm at [leonardija@hotmail.com](mailto:leonardija@hotmail.com) or 312.236.5011.

Thank you for your cooperation.

Gianna R. Scatchell

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

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Mary Andreolas, as Next Best Friend and mother of A. A. , a Minor	)	
	)	
PETITIONER,	)	
	)	
v.	)	CASE NO.
	)	
TWITTER INC,	)	
	)	
RESPONDENT.	)	
	)	

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**ORDER**

This cause coming to be heard on the above-captioned Petition for Pre-Suit Discovery (“Petition”) filed pursuant to Illinois Supreme Court Rule 224, due notice having been given, and the Court being fully advised in the premises, **IT IS HEREBY ORDERED:**

1. Absent an objection or motion for protective order filed prior to the expiration of Respondent’s notice period (20 days from the date of the notice of this Order to the user), Respondent shall produce to Petitioner’s counsel reasonably available basic subscriber information (“BSI”) that Respondent may have, if any, for the Twitter accounts with the following handles:

*@problemscentury and @centuryproblem.*

2. Upon Respondent’s production of BSI or certification that no responsive information exists, Petitioner shall dismiss the Petition with prejudice within 14 days.

3. If any objections or motions to quash are filed within the 20 day period subsequent to issuing notice, Respondent shall not be obligated to produce BSI pending resolution of the motions or objections, and then only to the extent ordered by the Court. If productions are

made by some but not all the Respondents due to user objections or intervention, the Petition will be dismissed as to those Respondents who have produced BSI.

4. Respondent’s production of BSI shall satisfy and fully discharge any and all of Respondent’s obligations in connection with any past or future proceedings in this matter.

5. This Matter is continued for subsequent case management conference on \_\_\_\_, 2014 at \_\_ am in Room .

Date:

ENTER:

\_\_\_\_\_

JUDGE

**AGREED AS TO FORM AND CONTENTS:**

By: \_\_\_\_\_

Jade R. Lambert  
Perkins Coie LLP  
131 South Dearborn St., Suite 1700  
Chicago, Illinois 60603-5559

By: \_\_\_\_\_

Gianna Scatchell  
Gruber-Scatchell  
320 W. Ohio Street, 3W Suite 25  
Chicago, Illinois 60654

## General Information

<b>Court</b>	Illinois Circuit Court, Cook County, Law Division
<b>Docket Number</b>	2013-L-013482
<b>Status</b>	Open