

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

TITAN SECURITY SERVICES, INC.)	
)	
Petitioner,)	
)	
vs.)	No.
)	
TWITTER, INC.)	
)	
Respondent.)	

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 E-COURT REPORTING
 SUPERIOR COURT OF COOK COUNTY, IL

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 Discovery

PETITION FOR DISCOVERY

Now comes the Petitioner, TITAN SECURITY SERVICES, INC. (“Titan”), by and through its attorneys, Daley Mohan Groble, P.C., and for its Petition for Discovery directed to the Respondent, TWITTER, INC. (“Twitter”), pursuant to Illinois Supreme Court Rule 224, states as follows:

1. Petitioner, Titan, is an Illinois corporation having its principal place of business in the City of Chicago, Cook County, Illinois.
2. Respondent, Twitter, is a Delaware corporation which maintains an office within the City of Chicago, Cook County, Illinois.
3. At all times relevant hereto, the Respondent, Twitter, maintained an internet-based social media outlet that publishes user-based content into the public domain.
4. On or about July 29, 2014, Titan discovered that a user on Twitter’s social media website had impersonated one of Titan’s executives, made disparaging and libelous statements against said individual as well as against Titan, its services, and its clients, and had published other inflammatory and indecent statements and media.


5. While Twitter has deactivated the user's account pursuant to their terms of service, a subpoena is necessary to permit Twitter to disclose the identity of the person(s) who established the account and published the offending statements and media.

6. The following discovery is sought from the Respondent:

- a. the disclosure of the identity of the person(s) who established, maintained, and/or accessed the subject account/user and all contact information associated with such person(s) and the account (user data, e-mail addresses, physical addresses, and/or phone numbers);
- b. the disclosure of all other users who associated with the subject account ("followers" of the account, and other accounts that the subject user "followed");
- c. the disclosure of the location and/or method of access of the subject user (IP address and provider with login/usage history);
- d. copies of all postings and other content provided by the user and/or associated with the account;
- e. the disclosure of the identity of other accounts that were created or are accessed, maintained, or otherwise associated with the subject account/user; and,
- f. any other information in the possession of the Respondent regarding the content posted by the subject user or which would provide information as to the identity of the person(s) responsible therefor.

WHEREFORE, Petitioner, TITAN SECURITY SERVICES, INC., requests the entry of an Order for Discovery requiring Respondent, TWITTER, INC., to disclose information and produce documents and other tangible evidence as herein requested, and for such other relief as this Court deems just and reasonable.

Respectfully Submitted,
TITAN SECURITY SERVICES, INC.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a horizontal line.

By One of Its Attorneys

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VERIFICATION BY CERTIFICATION

Under 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 he or she verily believes the same to be true.



Dave S. Pack
Titan Security Services, Inc.

General Information

Court	Illinois Circuit Court, Cook County, Law Division
Docket Number	2014-L-008511
Status	Open