

27878

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

MARIE ELIZABETH NAPOLI,

Plaintiff,

vs.

BREAKING MEDIA, INC., a foreign Corporation,
EMPLOYMENT RESEARCH INSTITUTE, a foreign
company, ASSOCIATED NEWSPAPERS, LTD., a
foreign Corporation, TELEGRAPH MEDIA GROUP
LIMITED, a foreign Corporation, JOHN MORGAN
CRAIG, CLOUDFLARE, a foreign Corporation,
BCG ATTORNEY RESEARCH, a foreign corporation,
RACKSPACE, a foreign corporation, AKAMAI INC, a
foreign corporation and GOOGLE, a foreign
corporation,

Defendants.

2015CH16045
CALENDAR/ROOM 04
TIME 00:00
Injunction

No.

2015 OCT 30 PM 3:12

**COMPLAINT FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY AND
PERMANENT INJUNCTION, DEFAMATION, INTENTIONAL INTERFERENCE WITH
A PROSPECTIVE BUSINESS RELATIONSHIP AND OTHER RELIEF**

Now comes Plaintiff, MARIE ELIZABETH NAPOLI, by and through her counsel, JEFFREY D. JAVORS, ESQ., and for her Complaint for relief against Defendants, BREAKING MEDIA, INC., a foreign Corporation, EMPLOYMENT RESEARCH INSTITUTE, a foreign company, ASSOCIATED NEWSPAPERS, LTD., a foreign Corporation, TELEGRAPH MEDIA GROUP LIMITED, a foreign Corporation, JOHN MORGAN CRAIG, CLOUDFLARE, a foreign Corporation, BCG ATTORNEY RESEARCH, a foreign corporation, RACKSPACE, a foreign corporation, AKAMAI INC, a foreign corporation and GOOGLE, a foreign corporation, states as follows:

COUNT I
TEMPORARY RESTRAINING ORDER, PRELIMINARY
AND PERMANENT INJUNCTION
BREAKING MEDIA & CLOUDFLARE

1. At all relevant times, Plaintiff, MARIE ELIZABETH NAPOLI, (hereafter "Marie") is a licensed Attorney, registered as an Attorney with the Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois and maintains an office in

the City of Chicago, Cook County, Illinois. At all relevant times, through advertisement, referring Attorneys and “good will” of current and former clients, she actively seeks new clients for representation in courts throughout the State of Illinois, primarily on a contingency basis.

2. At all relevant times, Defendant, BREAKING MEDIA, INC., a foreign Corporation, owns and operates a network of Websites, e-newsletters, events and social media channels for business communities, including *Above the Law*, offering legal news for legal professionals, including those practicing throughout the State of Illinois.

3. At all relevant times, Defendant, CLOUDFLARE, a foreign Corporation, owns and operates Web Hosting facilities and services for its clients, including BREAKING MEDIA, INC., to allow its clients to publish their content over the Internet, to be viewed throughout the State of Illinois.

4. At all relevant times, Defendant, EMPLOYMENT RESEARCH INSTITUTE, a foreign company, (hereafter “ERI”), owns and publishes *JDJOURNAL*, an online news magazine for the legal community, including those practicing throughout the State of Illinois.

5. At all relevant times, Defendant, BCG ATTORNEY RESEARCH, a foreign Corporation, owns and operates Web Hosting facilities and services for its clients, including EMPLOYMENT RESEARCH INSTITUTE, to allow its clients to publish their content over the Internet, to be viewed throughout the State of Illinois.

6. At all relevant times, Defendant, ASSOCIATED NEWSPAPERS, LTD., a foreign Corporation, (hereafter “ANL”), is a consumer media company, which publishes, among others, the *Daily Mail* and *Mail Online* to provide businesses and consumers with high-quality analysis and insight, information, news and entertainment through newspapers and digital media disseminated worldwide via the Internet, including throughout the State of Illinois.

7. At all relevant times, Defendant, RACKSPACE, a foreign Corporation, owns and operates Web Hosting facilities and services for its clients, including ASSOCIATED NEWSPAPERS, LTD., to allow its clients to publish their content over the Internet, to be viewed throughout the State of Illinois.

8. At all relevant times, Defendant, TELEGRAPH MEDIA GROUP LIMITED, a foreign Corporation, (hereafter “*Telegraph*”) is a multi-media news publishing company that publishes daily and weekly publications in print and electronic versions, including *the Telegraph*, offering news for consumers, including those living throughout the State of Illinois.

9. At all relevant times, Defendant, AKAMAI INC, a foreign Corporation, owns and operates Web Hosting facilities and services for its clients, including TELEGRAPH MEDIA GROUP LIMITED, to allow its clients to publish their content over the Internet, to be viewed throughout the State of Illinois.

10. At all relevant times, Defendant, JOHN MORGAN CRAIG, (hereafter “CRAIG”) is the publisher of an online blog, *Just Not Said*, through the digital platform, *BLOGGER.com*, offering to the electronic public, his version of news and commentary via digital media disseminated worldwide via the Internet, including throughout the State of Illinois.

11. At all relevant times, Defendant, AKAMAI INC, a foreign Corporation, owns and operates Web Hosting facilities and services for its clients, including JOHN MORGAN CRAIG, to allow its clients to publish their content over the Internet, to be viewed throughout the State of Illinois.

12. In early November, 2014, the *New York Post* published several articles in its print and online versions concerning Marie, her husband and his law firm. These articles specifically mentioned Marie and were replete with false and defamatory factual statements concerning her professional and private lives. While the false assertions regarding Marie were hurtful, they have had a serious detrimental impact on her family. Marie received death threats and two of her young children were tormented socially and have suffered scholastically.

13. After the *New York Post* published its articles, Defendants BREAKING MEDIA, in *Above the Law*; ERI, in *JDJOURNAL*; DMG, in the *Daily Mail and Mail Online*, TELEGRAPH, in the *Telegraph*, and CRAIG, in his online blog, *Just Not Said*, republished all or portions of the false and defamatory statements in their own versions, all of which either appeared in print or digital versions disseminated throughout the State of Illinois.

14. The articles published by Defendant, BREAKING MEDIA, in *Above the Law*, through its Web Hosting Service, CLOUDFLARE, assert numerous times that Marie killed one of her husband's former employee's cat and that she stalked or harassed that former employee via e-mail and regular mail. (Attached as Exhibit 1 is a copy of the version published by BREAKING MEDIA). Those statements are false and clearly violate Illinois law as they are defamatory *per se* as Illinois has a criminal Intimidation statute, which includes the crimes of "Intimidation", 720 ILCS 5/12-6; "Stalking", 720 ILCS 5/12-7.3 and "Cyberstalking", 720 ILCS 5/12-7.5.

15. The BREAKING MEDIA articles, in *Above the Law*, published on the Internet through its Web Hosting Service, CLOUDFLARE, assert facts which only allow a reasonably objective reader to conclude that Marie committed the crimes set forth in those articles, any of which include a charge that she engaged in a course of conduct that included surveillance of the former employee, transmitted threats of harm or placed the former employee in reasonable apprehension of bodily harm and interfered with or damaged the former employee's pet cat.

16. These factual statements against Marie are sufficient to allow a Court to find, under the pronouncements of the Illinois Supreme Court, that they are defamatory *per se*. They impute that Marie has committed those crimes, they impute that she is unable to perform or lacks integrity in her employment and they impute that she lacks ability or otherwise prejudices Marie in her profession as an Attorney.

17. Marie, since the publication of these articles and continuing to the present due to the permanence of digital versions of the articles which are available daily on the Defendant's digital platforms, continues to suffer both personally and professionally from the adverse effects of these articles.

18. Due to the continued publication of these articles in the Defendant BREAKING MEDIA's online media, through its Web Hosting Service, CLOUDFLARE, Marie and her family members are subject to defamatory and negative content. Marie, professionally, has suffered in a diminution of persons who actually retain her services, as a number of potential Illinois clients, upon an online investigation of Marie's

professional history, which now includes the defamatory and false articles continuously published by Defendants, have failed to retain her professional services.

19. Marie, in an attempt to resolve the issue regarding the continuing publishing of the defamatory content, has contacted Defendants BREAKING MEDIA and CLOUDFLARE, requesting that the offending content be permanently deleted from Defendants' print and digital platform. The *New York Post* has acquiesced to Marie's request and has deleted or is in the process of deleting the offending content from its print and digital platform.

20. Defendants, BREAKING MEDIA and CLOUDFLARE, as of the filing of this action, have refused to discontinue publishing the defamatory content and/or remove the defamatory content.

21. Plaintiff has a clearly ascertainable right and interest that must be protected in her entitlement to protect her personal and professional life from being subject to daily exposure to such defamatory content, both in print and digital platforms.

22. Plaintiff will suffer irreparable harm or injury should the offending content not be permanently deleted from Defendant BREAKING MEDIA's print and digital platform, through CLOUDFLARE'S web hosting services. There are no other options available for Plaintiff, as she can not effectively counteract the negative impact upon both her personal and professional lives sustained by the continued daily publication of the offending content. Her business is affected on a daily basis due to the insidious presence of digital media throughout the State of Illinois and worldwide.

23. Plaintiff has an inadequate remedy at law because monetary damages can not relieve the effects of the daily exposure to such defamatory content, both in print and digital platforms, upon her personal and professional lives due to the complete inability to counteract the pervasive negative effect of the articles upon persons investigating her history, without complete removal of the offending articles.

24. Plaintiff has a likelihood of success upon the merits as Defendants BREAKING MEDIA and CLOUDFLARE acted arbitrarily, capriciously and in bad faith when they published and republished the defamatory content, which imputes Marie's ability to provide adequate and professional representation to persons who wish to prosecute their cases in Illinois. Defendants BREAKING MEDIA and CLOUDFLARE's actions are in clear violation of well-established Illinois law.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, respectfully requests this Honorable Court to grant her the following relief:

A. Enter a temporary restraining Order and preliminary injunction in favor of Plaintiff against Defendants, BREAKING MEDIA and CLOUDFLARE, Ordering their employees and agents to immediately delete the defamatory content from their media platforms;

B. Enter a temporary restraining Order and preliminary injunction against Defendants BREAKING MEDIA and CLOUDFLARE and Their respective employees and agents, Ordering Defendants BREAKING MEDIA and CLOUDFLARE to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation;

C. Enter a permanent injunction against Defendants BREAKING MEDIA and CLOUDFLARE and their respective employees and agents, Ordering Defendants to

immediately delete the defamatory content from their media platforms and from further violating the due process rights of the Plaintiff; and

D. Enter a permanent injunction against Defendants BREAKING MEDIA and CLOUDFLARE and their respective employees and agents, Ordering Defendant to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation and for other relief that this Court deem just and reasonable.

COUNT II
TEMPORARY RESTRAINING ORDER, PRELIMINARY
AND PERMANENT INJUNCTION
EMPLOYMENT RESEARCH INSTITUTE & BCG ATTORNEY RESEARCH

1-13. Plaintiff adopts and realleges paragraphs 1 through 13 of Count I as paragraphs 1 through 13 of Count II, as though fully set forth herein.

14. The articles published by Defendant, ERI, in *JDJOURNAL*, through its Web Hosting Service BCG ATTORNEY RESEARCH, assert numerous times that Marie killed one of her husband's former employee's cat and that she stalked or harassed that former employee via e-mail and regular mail. (Attached as Exhibit 2 is a copy of the version published by ERI, in *JDJOURNAL*). Those statements are false and clearly violate Illinois law as they are defamatory *per se* as Illinois has a criminal Intimidation statute, which includes the crimes of "Intimidation", 720 ILCS 5/12-6; "Stalking", 720 ILCS 5/12-7.3 and "Cyberstalking", 720 ILCS 5/12-7.5.

15. The ERI articles, in *JDJOURNAL*, through its Web Hosting Service BCG ATTORNEY RESEARCH, assert facts which only allow a reasonably objective reader to conclude that Marie committed the crimes set forth in those articles, any of which include a charge that she engaged in a course of conduct that included surveillance of the former employee, transmitted threats of harm or placed the former employee in reasonable apprehension of bodily harm and interfered with or damaged the former employee's pet cat.

16. These factual statements against Marie are sufficient to allow a Court to find, under the pronouncements of the Illinois Supreme Court, that they are defamatory *per se*. They impute that Marie has committed those crimes, they impute that she is unable to perform or lacks integrity in her employment and they impute that she lacks ability or otherwise prejudices Marie in her profession as an Attorney.

17. Marie, since the publication of these articles and continuing to the present due to the permanence of digital versions of the articles which are available daily on the Defendants' digital platforms, continues to suffer both personally and professionally from the adverse effects of these articles.

18. Due to the continued publication of these articles in the Defendants ERI's online media, through its Web Hosting Service BCG ATTORNEY RESEARCH, Marie and her family members are subject to defamatory and negative content. Marie, professionally, has suffered in a diminution of persons who actually retain her services, as a number of potential Illinois clients, upon an online investigation of Marie's

professional history, which now includes the defamatory and false articles continuously published by Defendants, have failed to retain her professional services.

19. Marie, in an attempt to resolve the issue regarding the continuing publishing of the defamatory content, has contacted Defendants ERI and BCG ATTORNEY RESEARCH, requesting that the offending content be permanently deleted from Defendants' print and digital platform. The *New York Post* has acquiesced to Marie's request and has deleted or is in the process of deleting the offending content from its print and digital platform.

20. Defendants, ERI and BCG ATTORNEY RESEARCH, as of the filing of this action, have refused to discontinue publishing the defamatory content and/or remove the defamatory content.

21. Plaintiff has a clearly ascertainable right and interest that must be protected in her entitlement to protect her personal and professional life from being subject to daily exposure to such defamatory content, both in print and digital platforms.

22. Plaintiff will suffer irreparable harm or injury should the offending content not be permanently deleted from Defendant ERI and BCG ATTORNEY RESEARCH's print and digital platform. There are no other options available for Plaintiff, as she can not effectively counteract the negative impact upon both her personal and professional lives sustained by the continued daily publication of the offending content. Her business is affected on a daily basis due to the insidious presence of digital media throughout the State of Illinois and worldwide.

23. Plaintiff has an inadequate remedy at law because monetary damages can not relieve the effects of the daily exposure to such defamatory content, both in print and digital platforms, upon her personal and professional lives due to the complete inability to counteract the pervasive negative effect of the articles upon persons investigating her history, without complete removal of the offending articles.

24. Plaintiff has a likelihood of success upon the merits as Defendants ERI and BCG ATTORNEY RESEARCH acted arbitrarily, capriciously and in bad faith when they published and republished the defamatory content, which imputes Marie's ability to provide adequate and professional representation to person's who wish to prosecute their cases in Illinois. Defendants ERI and BCG ATTORNEY RESEARCH's actions are in clear violation of well-established Illinois law.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, respectfully requests this Honorable Court to grant her the following relief:

A. Enter a temporary restraining Order and preliminary injunction in favor of Plaintiff against Defendant, EMPLOYMENT RESEARCH INSTITUTE, Ordering its employees and agents to immediately delete the defamatory content from their media platforms;

B. Enter a temporary restraining Order and preliminary injunction against Defendants EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH, their respective employees and agents, Ordering Defendants EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation;

C. Enter a permanent injunction against Defendants EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH and their respective

employees and agents, Ordering Defendants to immediately delete the defamatory content from their media platforms and from further violating the due process rights of the Plaintiff; and

D. Enter a permanent injunction against Defendant EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH and their respective employees and agents, Ordering Defendants to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation and for other relief that this Court deem just and reasonable.

COUNT III
TEMPORARY RESTRAINING ORDER, PRELIMINARY
AND PERMANENT INJUNCTION
ASSOCIATED NEWSPAPERS, LTD. & RACKSPACE

1-13. Plaintiff adopts and realleges paragraphs 1 through 13 of Count I as paragraphs 1 through 13 of Count III, as though fully set forth herein.

14. The articles published by Defendant, ANL, in the *Daily Mail* and *Mail Online*, through its web hosting service, RACKSPACE, assert numerous times that Marie killed one of her husband's former employee's cat and that she stalked or harassed that former employee via e-mail and regular mail. (Attached as Exhibit 3 are copies of the versions published by ANL, in the *Daily Mail* and *Mail Online*). Those statements are false and clearly violate Illinois law as they are defamatory *per se* as Illinois has a criminal Intimidation statute, which includes the crimes of "Intimidation", 720 ILCS 5/12-6; "Stalking", 720 ILCS 5/12-7.3 and "Cyberstalking", 720 ILCS 5/12-7.5.

15. The ANL articles, in the *Daily Mail* and *Mail Online*, through its web hosting service, RACKSPACE, assert facts which only allow a reasonably objective reader to conclude that Marie committed the crimes set forth in those articles, any of which include a charge that she engaged in a course of conduct that included surveillance of the former employee, transmitted threats of harm or placed the former employee in reasonable apprehension of bodily harm and interfered with or damaged the former employee's pet cat.

16. These factual statements against Marie are sufficient to allow a Court to find, under the pronouncements of the Illinois Supreme Court, that they are defamatory *per se*. They impute that Marie has committed those crimes, they impute that she is unable to perform or lacks integrity in her employment and they impute that she lacks ability or otherwise prejudices Marie in her profession as an Attorney.

17. Marie, since the publication of these articles and continuing to the present due to the permanence of digital versions of the articles which are available daily on the Defendants' digital platforms, continues to suffer both personally and professionally from the adverse effects of these articles.

18. Due to the continued publication of these articles in the Defendant ANL's online media, through its web hosting service, RACKSPACE, Marie and her family members are subject to defamatory and negative content. Marie, professionally, has suffered in a diminution of persons who actually retain her services, as a number of potential Illinois clients, upon an online investigation of Marie's professional history,

which now includes the defamatory and false articles continuously published by Defendants, have failed to retain her professional services.

19. Marie, in an attempt to resolve the issue regarding the continuing publishing of the defamatory content, has contacted Defendants ANL and RACKSPACE, , requesting that the offending content be permanently deleted from Defendants' print and digital platform. The *New York Post* has acquiesced to Marie's request and has deleted or is in the process of deleting the offending content from its print and digital platform.

20. Defendants, ANL and RACKSPACE, as of the filing of this action, have refused to discontinue publishing the defamatory content and/or remove the defamatory content.

21. Plaintiff has a clearly ascertainable right and interest that must be protected in her entitlement to protect her personal and professional life from being subject to daily exposure to such defamatory content, both in print and digital platforms.

22. Plaintiff will suffer irreparable harm or injury should the offending content not be permanently deleted from Defendants ANL and RACKSPACE's print and digital platform. There are no other options available for Plaintiff, as she can not effectively counteract the negative impact upon both her personal and professional lives sustained by the continued daily publication of the offending content. Her business is affected on a daily basis due to the insidious presence of digital media throughout the State of Illinois and worldwide.

23. Plaintiff has an inadequate remedy at law because monetary damages can not relieve the effects of the daily exposure to such defamatory content, both in print and digital platforms, upon her personal and professional lives due to the complete inability to counteract the pervasive negative effect of the articles upon persons investigating her history, without complete removal of the offending articles.

24. Plaintiff has a likelihood of success upon the merits as Defendants ANL and RACKSPACE acted arbitrarily, capriciously and in bad faith when they published and republished the defamatory content, which imputes Marie's ability to provide adequate and professional representation to person's who wish to prosecute their cases in Illinois. Defendants ANL and RACKSPACE's actions are in clear violation of well-established Illinois law.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, respectfully requests this Honorable Court to grant her the following relief:

A. Enter a temporary restraining Order and preliminary injunction in favor of Plaintiff against Defendants, ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE, Ordering their respective employees and agents to immediately delete the defamatory content from their media platforms;

B. Enter a temporary restraining Order and preliminary injunction against Defendants ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE and their respective employees and agents, Ordering Defendants ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation;

C. Enter a permanent injunction against Defendants ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE and their respective employees and agents,

Ordering Defendants to immediately delete the defamatory content from their media platforms and from further violating the due process rights of the Plaintiff; and

D. Enter a permanent injunction against Defendants ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE and their respective employees and agents, Ordering Defendants to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation and for other relief that this Court deem just and reasonable.

COUNT IV
TEMPORARY RESTRAINING ORDER, PRELIMINARY
AND PERMANENT INJUNCTION
TELEGRAPH MEDIA GROUP LIMITED & AKAMAI INC

1-13. Plaintiff adopts and realleges paragraphs 1 through 13 of Count I as paragraphs 1 through 13 of Count IV, as though fully set forth herein.

14. The articles published by Defendants, TELEGRAPH, in *The Telegraph*, through its web hosting service, AKAMAI INC, assert numerous times that Marie killed one of her husband's former employee's cat and that she stalked or harassed that former employee via e-mail and regular mail. (Attached as Exhibit 4 is a copy of the version published by TELEGRAPH, in *The Telegraph*). Those statements are false and clearly violate Illinois law as they are defamatory *per se* as Illinois has a criminal Intimidation statute, which includes the crimes of "Intimidation", 720 ILCS 5/12-6; "Stalking", 720 ILCS 5/12-7.3 and "Cyberstalking", 720 ILCS 5/12-7.5.

15. The articles in *The Telegraph*, through its web hosting service, AKAMAI INC, assert facts which only allow a reasonably objective reader to conclude that Marie committed the crimes set forth in those articles, any of which include a charge that she engaged in a course of conduct that included surveillance of the former employee, transmitted threats of harm or placed the former employee in reasonable apprehension of bodily harm and interfered with or damaged the former employee's pet cat.

16. These factual statements against Marie are sufficient to allow a Court to find, under the pronouncements of the Illinois Supreme Court, that they are defamatory *per se*. They impute that Marie has committed those crimes, they impute that she is unable to perform or lacks integrity in her employment and they impute that she lacks ability or otherwise prejudices Marie in her profession as an Attorney.

17. Marie, since the publication of these articles and continuing to the present due to the permanence of digital versions of the articles which are available daily on the Defendant's digital platforms, continues to suffer both personally and professionally from the adverse effects of these articles.

18. Due to the continued publication of these articles in the Defendant TELEGRAPH's online media, through its web hosting service, AKAMAI INC, Marie and her family members are subject to defamatory and negative content. Marie, professionally, has suffered in a diminution of persons who actually retain her services, as a number of potential Illinois clients, upon an online investigation of Marie's professional history, which now includes the defamatory and false articles continuously published by Defendants, have failed to retain her professional services.

19. Marie, in an attempt to resolve the issue regarding the continuing publishing of the defamatory content, has contacted Defendants TELEGRAPH and AKAMAI INC, requesting that the offending content be permanently deleted from Defendants' print and digital platform. The *New York Post* has acquiesced to Marie's request and has deleted or is in the process of deleting the offending content from its print and digital platform.

20. Defendants, TELEGRAPH and AKAMAI INC, as of the filing of this action, have refused to discontinue publishing the defamatory content and/or remove the defamatory content.

21. Plaintiff has a clearly ascertainable right and interest that must be protected in her entitlement to protect her personal and professional life from being subject to daily exposure to such defamatory content, both in print and digital platforms.

22. Plaintiff will suffer irreparable harm or injury should the offending content not be permanently deleted from Defendants TELEGRAPH and AKAMAI INC's print and digital platform. There are no other options available for Plaintiff, as she can not effectively counteract the negative impact upon both her personal and professional lives sustained by the continued daily publication of the offending content. Her business is affected on a daily basis due to the insidious presence of digital media throughout the State of Illinois and worldwide.

23. Plaintiff has an inadequate remedy at law because monetary damages can not relieve the effects of the daily exposure to such defamatory content, both in print and digital platforms, upon her personal and professional lives due to the complete inability to counteract the pervasive negative effect of the articles upon persons investigating her history, without complete removal of the offending articles.

24. Plaintiff has a likelihood of success upon the merits as Defendants TELEGRAPH and AKAMAI INC acted arbitrarily, capriciously and in bad faith when they published and republished the defamatory content, which imputes Marie's ability to provide adequate and professional representation to person's who wish to prosecute their cases in Illinois. Defendants TELEGRAPH and AKAMAI INC's actions are in clear violation of well-established Illinois law.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, respectfully requests this Honorable Court to grant her the following relief:

A. Enter a temporary restraining Order and preliminary injunction in favor of Plaintiff against Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, Ordering their respective employees and agents to immediately delete the defamatory content from their media platforms;

B. Enter a temporary restraining Order and preliminary injunction against Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, Ordering their respective employees and agents to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation;

C. Enter a permanent injunction against Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, Ordering their respective employees and agents, Ordering Defendants to immediately delete the defamatory content from their media platforms and from further violating the due process rights of the Plaintiff; and

D. Enter a permanent injunction against Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, Ordering their respective employees and agents,

to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation and for other relief that this Court deem just and reasonable.

COUNT V
TEMPORARY RESTRAINING ORDER, PRELIMINARY
AND PERMANENT INJUNCTION
JOHN MORGAN CRAIG & GOOGLE

1-13. Plaintiff adopts and realleges paragraphs 1 through 13 of Count I as paragraphs 1 through 13 of Count V, as though fully set forth herein.

14. The article published by Defendant, CRAIG, in his online blog, *Just Not Said*, titled *Sociopath alert: Marie Napoli*, through its web hosting service, GOOGLE, asserts that Marie is a "Sociopath", that Marie killed one of her husband's former employee's cat and that she stalked or harassed that former employee via e-mail and regular mail. (Attached as Exhibit 5 is a copy of the version published by CRAIG, in his online blog, *Just Not Said*). Those statements are false and clearly violate Illinois law as they are defamatory *per se* as Illinois has a criminal Intimidation statute, which includes the crimes of "Intimidation", 720 ILCS 5/12-6; "Stalking", 720 ILCS 5/12-7.3 and "Cyberstalking", 720 ILCS 5/12-7.5.

15. The CRAIG article, in his online blog, *Just Not Said*, through its web hosting service, GOOGLE, asserts facts which only allow a reasonably objective reader to conclude that Marie committed the crimes set forth in that article, any of which include a charge that she engaged in a course of conduct that included surveillance of the former employee, transmitted threats of harm or placed the former employee in reasonable apprehension of bodily harm and interfered with or damaged the former employee's pet cat.

16. These factual statements against Marie are sufficient to allow a Court to find, under the pronouncements of the Illinois Supreme Court, that they are defamatory *per se*. They impute that Marie has committed those crimes, they impute that she is unable to perform or lacks integrity in her employment and they impute that she lacks ability or otherwise prejudices Marie in her profession as an Attorney.

17. Marie, since the publication of these articles and continuing to the present due to the permanence of digital versions of the articles which are available daily on the Defendants' digital platforms, continues to suffer both personally and professionally from the adverse effects of these articles.

18. Due to the continued publication of the article in the Defendant CRAIG's online blog, *Just Not Said*, through its web hosting service, GOOGLE, Marie and her family members are subject to defamatory and negative content. Marie, professionally, has suffered in a diminution of persons who actually retain her services, as a number of potential Illinois clients, upon an online investigation of Marie's professional history, which now includes the defamatory and false articles continuously published by Defendants, have failed to retain her professional services.

19. Marie, in an attempt to resolve the issue regarding the continuing publishing of the defamatory content, has contacted Defendants CRAIG and GOOGLE, requesting

that the offending content be permanently deleted from Defendants' print and digital platform. The *New York Post* has acquiesced to Marie's request and has deleted or is in the process of deleting the offending content from its print and digital platforms.

20. Defendants, CRAIG and GOOGLE, as of the filing of this action, have refused to discontinue publishing the defamatory content and/or remove the defamatory content.

21. Plaintiff has a clearly ascertainable right and interest that must be protected in her entitlement to protect her personal and professional life from being subject to daily exposure to such defamatory content, both in print and digital platforms.

22. Plaintiff will suffer irreparable harm or injury should the offending content not be permanently deleted from Defendants CRAIG and GOOGLE's digital platform. There are no other options available for Plaintiff, as she can not effectively counteract the negative impact upon both her personal and professional lives sustained by the continued daily publication of the offending content. Her business is affected on a daily basis due to the insidious presence of digital media throughout the State of Illinois and worldwide.

23. Plaintiff has an inadequate remedy at law because monetary damages can not relieve the effects of the daily exposure to such defamatory content, both in print and digital platforms, upon her personal and professional lives due to the complete inability to counteract the pervasive negative effect of the articles upon persons investigating her history, without complete removal of the offending articles.

24. Plaintiff has a likelihood of success upon the merits as Defendants CRAIG and GOOGLE acted arbitrarily, capriciously and in bad faith when they published and republished the defamatory content, which imputes Marie's ability to provide adequate and professional representation to person's who wish to prosecute their cases in Illinois. Defendants CRAIG and GOOGLE's actions are in clear violation of well-established Illinois law.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, respectfully requests this Honorable Court to grant her the following relief:

A. Enter a temporary restraining Order and preliminary injunction in favor of Plaintiff against Defendants, JOHN MORGAN CRAIG and GOOGLE, Ordering their respective employees and agents to immediately delete the defamatory content from his media platforms;

B. Enter a temporary restraining Order and preliminary injunction against Defendants, JOHN MORGAN CRAIG and GOOGLE, Ordering their respective employees and agents to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation;

C. Enter a permanent injunction against Defendants, JOHN MORGAN CRAIG and GOOGLE, and their respective employees and agents, Ordering Defendants to immediately delete the defamatory content from his media platform and from further violating the due process rights of the Plaintiff; and

D. Enter a permanent injunction against Defendants, JOHN MORGAN CRAIG and GOOGLE, and their respective employees and agents, Ordering Defendants to cease and desist any continuing attempts to publish the offending content regarding Plaintiff and her professional reputation and for other relief that this Court deem just and reasonable.

COUNT VI
DEFAMATION, LIBEL, AND SLANDER
BREAKING MEDIA & CLOUDFLARE

1-20. Plaintiff adopts and realleges paragraphs 1 through 20 of Count I as paragraphs 1 through 15 of Count VI, as though fully set forth herein.

21. Defendant, BREAKING MEDIA, through its media outlet, *Above the Law*, published an article, *Law Firm Rocked by Allegations of Affairs, Financial Problems . . . and A Missing Cat*, (Exhibit 1), which through its web hosting service, CLOUDFLARE, was disseminated worldwide via the Internet and at all relevant times, was viewed by persons located in Chicago, Cook County, Illinois.

22. All of factual statements contained in the article published by BREAKING MEDIA, through its web hosting service, CLOUDFLARE about Marie regarding stalking, harassment, investigation and killing a cat (the "Defamatory Statements") are false.

23. The Defamatory Statements are of and concerning Marie in both her professional and personal lives.

24. The Defamatory Statements were published (without permission) and continue to be published by Defendants BREAKING MEDIA through its web hosting service, Defendant CLOUDFLARE to members of the community in and throughout the State of Illinois.

25. Defendants BREAKING MEDIA and CLOUDFLARE knew or should have known that the Defamatory Statements were false at the time it made them or acted with reckless disregard as to their truth or falsity when it originally published them. Since that occurred, Defendants BREAKING MEDIA and CLOUDFLARE has been aware the Defamatory Statements were false at the time they made them and continue to and refuse to remove the offending written content from its media platforms.

26. Defendants BREAKING MEDIA and CLOUDFLARE deliberately published the Defamatory Statements knowing they would be disseminated to a broad audience in order to lead readers of the Defamatory Statements to form the false impression that Marie had engaged in wrongdoing and likely would harm her reputation.

27. As a result of continued daily publication of the Defamatory Statements, Marie has suffered emotional damages, harm to her reputation and has lost clients who were interested in retaining her services, to Marie's detriment and damage.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendants, BREAKING MEDIA, INC. and CLOUDFLARE , for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT VII
DEFAMATION, LIBEL, AND SLANDER
EMPLOYMENT RESEARCH INSTITUTE & BCG ATTORNEY RESEARCH

1-20. Plaintiff adopts and realleges paragraphs 1 through 20 of Count II as paragraphs 1 through 20 of Count VII, as though fully set forth herein.

21. Defendant, ERI, through its online news magazine, *JDJOURNAL*, published an article, *Law Firm Torn by Top Partner's Love Affair*, (Exhibit 2), which through its web hosting service BCG ATTORNEY RESEARCH was disseminated worldwide via the Internet and at all relevant times, were viewed by persons located in Chicago, Cook County, Illinois.

22. The factual statements contained in the article published by ERI, through its online news magazine, *JDJOURNAL* through its web hosting service BCG ATTORNEY RESEARCH about Marie regarding stalking, harassment, investigation and a cat (the "Defamatory Statements") are false.

23. The Defamatory Statements are of and concerning Marie in both her professional and personal lives.

24. The Defamatory Statements were published (without permission) and continue to be published by Defendants ERI and BCG ATTORNEY RESEARCH to members of the community in and throughout the State of Illinois.

25. Defendants ERI and BCG ATTORNEY RESEARCH knew or should have known that the Defamatory Statements were false at the time it made them or acted with reckless disregard as to their truth or falsity when it originally published them. Since that occurred, Defendants ERI and BCG ATTORNEY RESEARCH have been aware the Defamatory Statements were false at the time they made them and continue to and refuse to remove the offending written content from their media platforms.

26. Defendants ERI and BCG ATTORNEY RESEARCH deliberately published the Defamatory Statements knowing they would be disseminated to a broad audience in order to lead readers of the Defamatory Statements to form the false impression that Marie had engaged in wrongdoing and likely would harm her reputation.

27. As a result of continued daily publication of the Defamatory Statements, Marie has suffered emotional damages, harm to her reputation and has lost clients who were interested in retaining her services, to Marie's detriment and damage.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendant, EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT VIII
DEFAMATION, LIBEL, AND SLANDER
ASSOCIATED NEWSPAPERS, LTD. & RACKSPACE

1-20. Plaintiff adopts and realleges paragraphs 1 through 20 of Count III as paragraphs 1 through 20 of Count VIII, as though fully set forth herein.

21. Defendant, ANL, through its media outlets the *Daily Mail* and *Mail Online*, published the two articles, *Top 9/11 lawyer accuses firm partner of using prostitutes and having a liaison with a receptionist at a Christmas Party as part of heated legal dispute* and *Mistress of Top 9/11 lawyer files \$11M lawsuit claiming he continued to pursue affair even after his wife found out and 'started a campaign of harassment'*, which through its web hosting service RACKSPACE was disseminated worldwide via the

Internet and at all relevant times were viewed by persons located in Chicago, Cook County, Illinois.

22. The factual statements contained in the article published by ANL, through its media outlets the *Daily Mail* and *Mail Online* through its web hosting service RACKSPACE, about Marie regarding stalking, harassment, investigation and killing a cat (the "Defamatory Statements") are false.

23. The Defamatory Statements are of and concerning Marie in both her professional and personal lives.

24. The Defamatory Statements were published (without permission) and continue to be published by Defendants ANL and RACKSPACE to members of the community in and throughout the State of Illinois.

25. Defendants ANL and RACKSPACE knew or should have known that the Defamatory Statements were false at the time it made them or acted with reckless disregard as to their truth or falsity when it originally published them. Since that occurred, Defendants ANL and RACKSPACE has been aware the Defamatory Statements were false at the time they made them and continue to and refuse to remove the offending written content from its media platforms.

26. Defendants ANL and RACKSPACE deliberately published the Defamatory Statements knowing they would be disseminated to a broad audience in order to lead readers of the Defamatory Statements to form the false impression that Marie had engaged in wrongdoing and likely would harm her reputation.

27. As a result of continued daily publication of the Defamatory Statements, Marie has suffered emotional damages, harm to her reputation and has lost clients who were interested in retaining her services, to Marie's detriment and damage.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendants, ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT IX
DEFAMATION, LIBEL, AND SLANDER
TELEGRAPH MEDIA GROUP LIMITED & AKAMAI INC

1-20. Plaintiff adopts and realleges paragraphs 1 through 20 of Count IV as paragraphs 1 through 20 of Count IX, as though fully set forth herein.

21. TELEGRAPH MEDIA GROUP LIMITED through its media outlet, *the Telegraph*, published an article, *New York Law Firm Napoli Bern Ripka Shkolnik rocked by sex claims and power struggle*, which through its web hosting service AKAMAI INC was disseminated worldwide via the Internet and at all relevant times, were viewed by persons located in Chicago, Cook County, Illinois.

22. The factual statements contained in the article published by TELEGRAPH MEDIA GROUP LIMITED, through its media outlet, *the Telegraph*, through its web hosting service AKAMAI INC, about Marie regarding stalking, harassment, investigation and killing a cat (the "Defamatory Statements") are false.

23. The Defamatory Statements are of and concerning Marie in both her professional and personal lives.

24. The Defamatory Statements were published (without permission) and continue to be published by Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC to members of the community in and throughout the State of Illinois.

25. Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC knew or should have known that the Defamatory Statements were false at the time it made them or acted with reckless disregard as to their truth or falsity when it originally published them. Since that occurred, Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC have been aware the Defamatory Statements were false at the time they made them and continue to and refuse to remove the offending written content from its media platforms.

26. Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC deliberately published the Defamatory Statements knowing they would be disseminated to a broad audience in order to lead readers of the Defamatory Statements to form the false impression that Marie had engaged in wrongdoing and likely would harm her reputation.

27. As a result of continued daily publication of the Defamatory Statements, Marie has suffered emotional damages, harm to her reputation and has lost clients who were interested in retaining her services, to Marie's detriment and damage.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendant, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT X
DEFAMATION, LIBEL, AND SLANDER
JOHN MORGAN CRAIG & GOOGLE

1-20. Plaintiff adopts and realleges paragraphs 1 through 20 of Count V as paragraphs 1 through 20 of Count X, as though fully set forth herein.

21. CRAIG through his online blog, *Just Not Said*, published an article titled *Sociopath alert: Marie Napoli*, which through its web hosting service GOOGLE was disseminated worldwide via the Internet and at all relevant times, was viewed by persons located in Chicago, Cook County, Illinois.

22. The factual statements contained in the article published by CRAIG, through his online blog, *Just Not Said* through its web hosting service GOOGLE, about Marie regarding stalking, harassment, investigation and killing a cat (the "Defamatory Statements") are false.

23. The Defamatory Statements are of and concerning Marie in both her professional and personal lives.

24. The Defamatory Statements were published (without permission) and continue to be published by Defendants CRAIG and GOOGLE to members of the community in and throughout the State of Illinois.

25. Defendants CRAIG and GOOGLE knew or should have known that the Defamatory Statements were false at the time they made them or acted with reckless disregard as to their truth or falsity when they originally published them. Since that occurred, Defendants CRAIG and GOOGLE have been aware the Defamatory Statements were false at the time they made them and continue to and refuse to remove the offending written content from their media platforms.

26. Defendants CRAIG and GOOGLE deliberately published the Defamatory Statements knowing they would be disseminated to a broad audience in order to lead readers of the Defamatory Statements to form the false impression that Marie had engaged in wrongdoing and likely would harm her reputation.

27. As a result of continued daily publication of the Defamatory Statements, Marie has suffered emotional damages, harm to her reputation and has lost clients who were interested in retaining her services, to Marie's detriment and damage.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendant, JOHN MORGAN CRAIG and GOOGLE, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT XI
INTENTIONAL INTERFERENCE WITH A
PROSPECTIVE BUSINESS RELATIONSHIP
BREAKING MEDIA & CLOUDFLARE

1-27. Plaintiff adopts and realleges paragraphs 1 through 27 of Count VI as paragraphs 1 through 27 of Count XI, as though fully set forth herein.

28. After the Defendant BREAKING MEDIA had published its article, through its web hosting service, CLOUDFLARE, Plaintiff, by and through one of her Attorneys, sent a request to the Defendants advising them of the effect the article had upon her Personal and Professional lives, including upon her children and requested that Defendants remove its article from further publication. No actions were taken by the Defendants to comply with the request.

29. Thereafter, Marie sent notices to the Defendants advising them of the detrimental effect of the continued publication of their article upon her business in Illinois and demanded that the Defendants remove the offending article from their Internet media publications.

30. The Defendants BREAKING MEDIA and CLOUDFLARE deliberately, intentionally or with reckless disregard for the consequences of its acts or omissions, ignored Plaintiff's demand that they remove the offending article from their Internet publications, continuing to the present to re-publish the Defamatory Statements to persons in Illinois, which causes continuing damage to Plaintiff.

31. Plaintiff has sustained and continues to sustain damages due to Defendants BREAKING MEDIA and CLOUDFLARE's intentional or reckless disregard for Plaintiff's demands regarding her right not to be further damaged in her Professional life.

32. That as a direct and proximate result of one or more of the foregoing intentional or reckless interference with prospective business relationship by

Defendants, BREAKING MEDIA and CLOUDFLARE, Plaintiff has suffered damage as a direct and proximate result of the Defendants' intentional or reckless acts.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendants, BREAKING MEDIA, INC. and CLOUDFLARE, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT XII
INTENTIONAL INTERFERENCE WITH A
PROSPECTIVE BUSINESS RELATIONSHIP
EMPLOYMENT RESEARCH INSTITUTE & BCG ATTORNEY RESEARCH

1-27. Plaintiff adopts and realleges paragraphs 1 through 27 of Count VII as paragraphs 1 through 27 of Count XII, as though fully set forth herein.

28. After the Defendant ERI had published its article, through its web hosting service, BCG ATTORNEY RESEARCH, Plaintiff, by and through one of her Attorneys, sent a request to the Defendants advising them of the effect the article had upon her Personal and Professional lives, including upon her children and requested that Defendant remove its article from further publication. No actions were taken by the Defendants to comply with the request.

29. Thereafter, Marie sent notices to the Defendants advising them of the detrimental effect of the continued publication of their article upon her business in Illinois and demanded that the Defendants remove the offending article from their Internet media publications.

30. The Defendants ERI and BCG ATTORNEY RESEARCH deliberately, intentionally or with reckless disregard for the consequences of their acts or omissions, ignored Plaintiff's demand that they remove the offending article from their Internet publications, continuing to the present to re-publish the Defamatory Statements to persons in Illinois, which causes continuing damage to Plaintiff.

31. Plaintiff has sustained and continues to sustain damages due to Defendants ERI and BCG ATTORNEY RESEARCH's intentional or reckless disregard for Plaintiff's demands regarding her right not to be further damaged in her Professional life.

32. That as a direct and proximate result of one or more of the foregoing intentional or reckless interference with prospective business relationship by Defendants, ERI and BCG ATTORNEY RESEARCH, Plaintiff has suffered damage as a direct and proximate result of the Defendants' intentional or reckless acts.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendants, EMPLOYMENT RESEARCH INSTITUTE and BCG ATTORNEY RESEARCH, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT XIII
INTENTIONAL INTERFERENCE WITH A
PROSPECTIVE BUSINESS RELATIONSHIP
ASSOCIATED NEWSPAPERS, LTD. & RACKSPACE

1-27. Plaintiff adopts and realleges paragraphs 1 through 27 of Count VIII as paragraphs 1 through 27 of Count XIII, as though fully set forth herein.

28. After the Defendant ANL had published its articles, through its web hosting service, RACKSPACE, Plaintiff, by and through one of her Attorneys, sent a request to the Defendants advising them of the effect the articles had upon her Personal and Professional lives, including upon her children and requested that Defendant remove its articles from further publication. No actions were taken by the Defendants to comply with the request.

29. Thereafter, Marie sent notices to the Defendants advising them of the detrimental effect of the continued publication of their articles upon her business in Illinois and demanded that the Defendants remove the offending articles from their Internet media publications.

30. The Defendants ANL and RACKSPACE deliberately, intentionally or with reckless disregard for the consequences of their acts or omissions, ignored Plaintiff's demand that they remove the offending articles from their Internet publications, continuing to the present to re-publish the Defamatory Statements to persons in Illinois, which causes continuing damage to Plaintiff.

31. Plaintiff has sustained and continues to sustain damages due to Defendants ANL and RACKSPACE's intentional or reckless disregard for Plaintiff's demands regarding her right not to be further damaged in her Professional life.

32. That as a direct and proximate result of one or more of the foregoing intentional or reckless interference with prospective business relationship by Defendants, ANL and RACKSPACE, Plaintiff has suffered damage as a direct and proximate result of the Defendant's intentional or reckless acts.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendant, ASSOCIATED NEWSPAPERS, LTD. and RACKSPACE, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT XIV
INTENTIONAL INTERFERENCE WITH A
PROSPECTIVE BUSINESS RELATIONSHIP
TELEGRAPH MEDIA GROUP LIMITED & AKAMAI INC

1-27. Plaintiff adopts and realleges paragraphs 1 through 27 of Count IX as paragraphs 1 through 27 of Count XIV, as though fully set forth herein.

28. After the Defendant TELEGRAPH MEDIA GROUP LIMITED had published its article, through its web hosting service, AKAMAI INC, Plaintiff, by and through one of her Attorneys, sent a request to the Defendants advising them of the effect the articles had upon her Personal and Professional lives, including upon her children and

requested that Defendants remove their article from further publication. No actions were taken by the Defendants to comply with the request.

29. Thereafter, Marie sent notices to the Defendants advising them of the detrimental effect of the continued publication of their article upon her business in Illinois and demanded that the Defendants remove the offending article from their Internet media publications.

30. The Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC deliberately, intentionally or with reckless disregard for the consequences of their acts or omissions, ignored Plaintiff's demand that they remove the offending article from their Internet publications, continuing to the present to re-publish the Defamatory Statements to persons in Illinois, which causes continuing damage to Plaintiff.

31. Plaintiff has sustained and continues to sustain damages due to Defendants TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC's intentional or reckless disregard for Plaintiff's demands regarding her right not to be further damaged in her Professional life.

32. That as a direct and proximate result of one or more of the foregoing intentional or reckless interference with prospective business relationship by Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, Plaintiff has suffered damage as a direct and proximate result of the Defendants' intentional or reckless acts.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendants, TELEGRAPH MEDIA GROUP LIMITED and AKAMAI INC, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

COUNT XV
INTENTIONAL INTERFERENCE WITH A
PROSPECTIVE BUSINESS RELATIONSHIP
JOHN MORGAN CRAIG & GOOGLE

1-27. Plaintiff adopts and realleges paragraphs 1 through 27 of Count X as paragraphs 1 through 27 of Count XV, as though fully set forth herein.

28. After the Defendant JOHN MORGAN CRAIG had published his article, through its web hosting service, GOOGLE, Plaintiff, by and through one of her Attorneys, sent a request to the Defendants advising them of the effect the articles had upon her Personal and Professional lives, including upon her children and requested that Defendants remove its article from further publication. No actions were taken by the Defendants to comply with the request.

29. Thereafter, Marie sent notices to the Defendants advising them of the detrimental effect of the continued publication of their article upon her business in Illinois and demanded that the Defendants remove the offending article from their Internet media publications.

30. The Defendants CRAIG and GOOGLE deliberately, intentionally or with reckless disregard for the consequences of their acts or omissions, ignored Plaintiff's demand that they remove the offending article from their Internet publications,

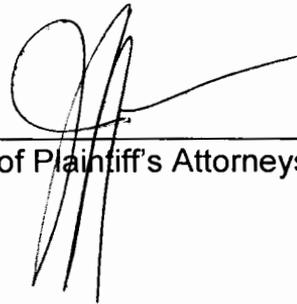
continuing to the present to re-publish the Defamatory Statements to persons in Illinois, which causes continuing damage to Plaintiff.

31. Plaintiff has sustained and continues to sustain damages due to Defendants CRAIG and GOOGLE's intentional or reckless disregard for Plaintiff's demands regarding her right not to be further damaged in her Professional life.

32. That as a direct and proximate result of one or more of the foregoing intentional or reckless interference with prospective business relationship by Defendants, CRAIG and GOOGLE, Plaintiff has suffered damage as a direct and proximate result of the Defendant's intentional or reckless acts.

WHEREFORE, Plaintiff, MARIE ELIZABETH NAPOLI, demands Judgment in her favor and against Defendant, JOHN MORGAN CRAIG and GOOGLE, for a sum in excess of One Million Dollars (\$1,000,000.00), together with costs and expenses, and for other relief that this Court deems just and reasonable.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Javors', is written over a horizontal line. The signature is stylized and cursive.

One of Plaintiff's Attorneys

JEFFREY D. JAVORS, ESQ.
111 West Washington Street
Suite 1240
Chicago, Illinois 60602
(312) 782-7466
Attorneys Code: 27878