

IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION

Reem Odeh)
)
 Petitioner,)
)
 v.) Case No.
)
 Google, Inc.)
)
 Respondent.)

FILED
MAR 23 PM 3:45
Circuit Court
Law Division

VERIFIED PETITION FOR DISCOVERY

Now Comes the Petitioner, Reem Odeh, an individual (“Petitioner”), by and through her attorneys, Oshana Law, and for her Verified Petition for Discovery against the Respondent, Google Inc., a Delaware Corporation (“Respondent”), states as follows:

2016L003131
CALENDAR ROOM E
FILE 00:00
Discovery

INTRODUCTION

1. This is a pre-lawsuit action for discovery to identify responsible persons.
2. Petitioner intends to file suit, sounding in an action for defamation, against the person(s) and/or entity responsible for the authorship and online publication of statements made on the webpages belonging to Respondent that pertain to the Petitioner.
3. Petitioner is filing this action so that the Respondent can identify the IP address and other account information of the person(s) which authored and published defamatory comments concerning and relating to Petitioner.

PARTIES, JURISDICTION, AND VENUE

4. Petitioner resides in Cook County, Illinois.
5. Respondent is a Delaware corporation, headquartered in Mountain View, California, that regularly does business in Cook County, Illinois. Respondent’s registered agent in Illinois for service of process is Illinois Corporation Service, located at 801 Adlai

Stevenson Dr., Springfield, IL 62703. Among other things, Respondent hosts crowd-sourced reviews about local businesses can be published.

6. Jurisdiction and Venue is proper in this Court pursuant to 735 ILCS 5/2-101 and 735 ILCS 5/2-102 and Illinois Supreme Court Rule 224(a)(ii) as this a Court in which the action or proceeding might be brought, Cook County is where the harm was felt/directed, and/or Respondent transacts business in Cook County.

FACTS

7. Respondent operates an internet website, Google.com, where individuals can create a profile, free of charge, and rate/review local businesses that can be viewed by other visitors of the website.
8. Petitioner maintains a page on the Respondent's website, which provides the public with information about her practice, "Law Offices of Reem Odeh", including the location, contact information, hours of operation, and a link to the Petitioner's firm's website. The Google.com page also includes reviews from individuals/Petitioner's former clients.
9. Between approximately January 25, 2016 – February 25, 2016, several reviews were posted on Petitioner's Google.com page, attached as Exhibit A, that include false and inflammatory accusations against the Petitioner.
10. In one of the reviews, an individual using the alias "Drea Sanchez" posted a review of the Petitioner, which included, "She is an embarrassment to all members of The Bar Association. The Supreme Court needs to suspend this horrible, lying and deceitful woman claiming to be a great lawyer. She has such a disrespectful conduct, falsely accuses the other parties and counsels in hopes to manipulate and berate them to withdraw any charges...".

11. In another review, an individual using the alias “Abdullah Mubarak” writes, in regards to Petitioner, “The most unprofessional trashy attorney you can find...Be aware from this trashy Reem Odeh that has a reputation of getting around. She showed up to court late as usual smelling like cheap beer. If you don’t care about wasting your money then invest it on this sharamoota” [Arabic slang for prostitute].
12. In another review, an individual using the alias “William Levi” writes, in regard to Petitioner, “EXTREMELY RUDE AND UNPROFESSIONAL HORRIBLE ATTITUDE AND YES ALWAYS LATE. THE FEW TIMES SHE DOES SHOW TO COURT IS NEVER PREPARED AND STUTTERS HALF WAY THROUGH – HER HARD TO UNDERSTAND SENTENCES...COMING FROM A MINORITY HERSELF I DON’T KNOW WHY SHE MAKES BAD REMARKS ABOUT THE LATIN/POLISH COMMUNITY...”.
13. In another review, an individual using the alias “Nura Galaski” writes, in regard to Petitioner, “Always rescheduled our court dates and never had any respect to let us know in advance she will not make it. Always running late and most of the time sent other “qualified” paralegals that didn’t know anything about the case. DEFINITELY WOULDN’T RECOMMEND TO ANYONE IN NEED OF HONEST TRUSTWORTHY REPRESENTATION.”
14. The reviews posted by “Drea Sanchez”, “Abdullah Mubarak”, “William Levi”, and “Nura Galaski” constitute unprivileged publications, as they were directed at third parties, specifically, any of the millions of internet users who might perform a Google search for the Petitioner.

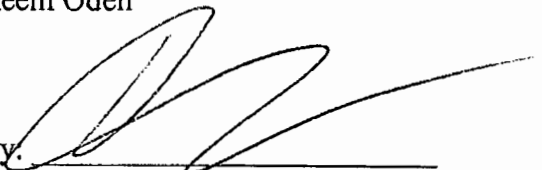
15. The 4 reviews referenced above are rife with false accusations regarding the Petitioner, a married woman, including allegations that Petitioner attends court appearances under the influence of alcohol; that she is adulterous; that she lies to the court and opposing counsel, in violation of the Illinois Rules of Professional Conduct; and otherwise incompetent at her profession.
16. The reviews posted by “Drea Sanchez”, “Abdullah Mubarak”, “William Levi”, and “Nura Galaski” were made maliciously, with knowledge that the statements were false, or with reckless disregard for whether the statements were true or false, as Petitioner has never represented anyone with those names, does not know anyone with those names, and denies all of the false statements made in the reviews.
17. Petitioner is prejudiced by the reviews since they accuse Petitioner of unethical, immoral, and illegal behavior, which impute a lack of integrity and ability in Petitioner’s profession.
18. Petitioner’s professional reputation has been, and continues to be, injured by the false statements included in the reviews by “Drea Sanchez”, “Abdullah Mubarak”, “William Levi”, and “Nura Galaski”.
19. Petitioner’s efforts to remove the objectionable content have been unsuccessful, since, as of the date of this filing, only the reviews posted by “Drea Sanchez” and “Abdullah Mubarak” have been removed.
20. Petitioner seeks to ascertain the true identities of “Drea Sanchez”, “Abdullah Mubarak”, “William Levi”, and “Nura Galaski” from Respondent to: 1) prevent future defamatory false statements from being disseminated; and 2) sue for damages.

21. Petitioner seeks discovery from Respondent, requesting that it produces any/all identifying information regarding the accounts of the users, "Drea Sanchez", "Abdullah Mubarak", "William Levi", and "Nura Galaski", that posted the above referenced reviews, and attached as Exhibit A, including, but not limited to: actual names, physical addresses, email addresses, and IP address(s).

WHEREFORE, Petitioner, Reem Odeh, requests that this Honorable Court enter an order, pursuant to Supreme Court Rule 224, compelling the discovery requests herein from Respondents.

Respectfully Submitted,

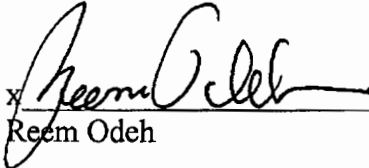
Reem Odeh

By. 
One of her attorneys

OSHANA LAW
20 N. Clark St., 30th Fl.
Chicago, IL 60602
312-404-8390
Firm I.D. 44899

VERIFICATION

Under the penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned, being first duly sworn, deposes and says that he has read the foregoing Petition, and that, to the best of her knowledge, information, and belief, formed after reasonable inquiry, it is true and correct.

x  _____
Reem Odeh

Law Offices of Reem Odeh

134 N LaSalle St, Chicago, IL

Write a review

3.9

22 reviews

Sort by: Most helpful



Drea Sanchez
in the last week

She is an embarrassment to all members of The Bar Association. The Supreme Court needs to suspend this horrible, lying and deceitful woman claiming to be a great lawyer. She has such a disrespectful conduct, falsely accuses the other parties and counsels in hopes to manipulate and berate them to withdraw any charges. What upsets me the most is that she checks in on social media every time she is at court and posts information about her cases. Where is the respect and privacy towards her clients? THE MOST DISRESPECTFUL AND LOW CLASS PERSON ANYONE CAN ENCOUNTER- BE CAREFUL THIS WOMAN IS VERY DECEITFUL.



Ace Jones
in the last week

Reem and Jennifer both helped me out with my divorce cases and Immigration, well worth the money and time. Humbling people who put in more effort than asked for. Ill definitely use her again for both fields. One of the best if not the best ... More



Abdullah Mubarak
a week ago

She is a NASTY PIECE OF WORK! The most unprofessional trashy attorney you can find. She will forget when is your court date, or remind you of any important information. Needless to say the ridiculous fees she charges for her cheap work. Be aware from this trashy Reem Odeh that has a reputation of getting around. She showed up to court late as usual smelling like cheap beer. If you don't care about wasting your money then invest it on this sharamoota. Trust me everyone in the Arab community know the piece of trash she is, you are better off hiring a homeless on Roosevelt to represent you over this trashy thot



William Levi
in the last week

Stenberg No. 5199
PLAINTIFF'S
EXHIBIT
A

Law Offices of Reem Odeh

134 N LaSalle St, Chicago, IL

Write a review

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Sort by: Most helpful ▾

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William Levi
in the last week

EXTREMELY RUDE AND UNPROFESSIONAL HORRIBLE ATTITUDE AND YES ALWAYS LATE. THE FEW TIMES SHE DOES SHOW TO COURT IS NEVER PREPARED AND STUTTERS HALF WAY THROUGH - HER HARD TO UNDERSTAND SENTENCES. DONT KNOW WHERE ALL THOSE FEW OTHER PRETEND-TO BE GREAT REVIEWS ARE COMING FROM BUT I DEFINITELY AGREE THAT THEY ARE 100% WRITTEN FROM EITHER HERSELF OR FRIENDS BECAUSE THERE IS NOOOOO WAY SHE IS ANYTHING CLOSE TO BEING GOOD NOR PROFESSIONAL. COMING FROM A MINORITY HERSELF I DONT KNOW WHY SHE MAKES BAD REMARKS ABOUT THE LATIN/POLISH COMMUNITY AND HAS STATED TO SUPPORT DONALD TRUMP WHEN SHE HERSELF IS AN IMMIGRANT STILL LEARNING THE LANGUAGE.... DONT WASTE YOUR MONEY THAT'S ALL I CAN SAY!



Hal Jwayyed
in the last week

Reem Odeh has been practicing law for over 13 years now. For the clients who have had an issue with her, let me tell you that whatever result has come from your case is due to your activity (or inactivity thereof). To all those who have ... More



Duaa Iwals
a week ago

Amazing lawyer nothing but great things to say about her and you can never go wrong with her. love you Reem keep up the great work. also for all you haters commentina and throwing their bad

Law Offices of Reem Odeh

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Write a review

3.9

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Duaa Iwais
a week ago

Amazing lawyer nothing but great things to say about her and you can never go wrong with her, love you Reem keep up the great work, also for all you haters commenting and throwing their bad remarks don't be mad because you lost custody of ... More



Thabet Mohammad
a week ago

She need to pay her family to write a good review on Google. Let's be honest she is as good and honest as car salesmen and mechanic lol Very disrespectful lady. I agree with the other reviews that she always late for court, if she can't take all your money trust me she don't care for your case. I honestly wouldn't recommend her services either. Traffic court she is the worst and immigration services? I recommend the Polish lady on 82 and Roberts Road instead she is professional and very honest unlike this money drainer Law Firm of Roemah Odeh

Law Offices of Reem Odeh

134 N LaSalle St, Chicago, IL

Write a review

3.9

22 reviews

Sort by: Most helpful



Aysar Hamdan
in the last week

Up most and very professional women. Both attorneys Reem and Jennifer are hard working amazing attorneys. Law Offices of Reem Odeh help with all sorts of cases!! Lovely women definitely recommend The Law Offices of Reem Odeh to everyone



Nura Galaski
a week ago

We had a very bad experience with this firm too. Always rescheduled our court dates and never had any respect to let us know in advance she will not make it. Always running late and most of the time sent other "qualified" paralegals that didn't know anything about the case. DEFINITELY WOULDNT RECOMMEND TO ANYONE IN NEED OF HONEST TRUSTWORTHY REPRESENTATION



Mobashir Hosameddin
4 months ago

Worst lawyer you will ever see, disrespectful, unprofessional. I hired her twice for 2 related cases. She made mistakes in both cases and refuse to correct the mistakes or even help me how to correct them and I should pay the fees again for her mistakes, she doesn't respond to phone calls, she doesn't give you a time to discuss your case, she sat with me the first time to get her full payment, she didn't show up in the interview(the reason I hired her for) called me in the morning to tell she can't make it and will send someone to cover her and the other lawyer doesn't know anything about my case and show up late. Now I have to hire a new lawyer and pay the application fees again.



Basem Qasem
a week ago -

Reem you are the best attorney thank you for all your hard work and for all those people who try to put you down and defame your name just brush them off they just mad because they can't have what they want and look pathetic in court ... More



Sarah Husa