

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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)
RAHUL MANCHANDA,)
)
Plaintiff,)
)
v.)
)
GOOGLE, YAHOO, MICROSOFT BING)
)
Defendants.)
-----X	

INDEX NO. 16-CV-03350

MOTION FOR CONTEMPT

PLEASE TAKE NOTICE that upon the annexed affirmation of Rahul Manchanda duly affirmed the 17th day of May 2016, the annexed Memorandum of Law, and all the Pleadings and Proceedings heretofore had herein, the Undersigned moves this Honorable Court for an order holding Google, Yahoo and Microsoft/Bing in Civil and Criminal Contempt of Court for wilful non-compliance with 2 lawful court orders from NYS Supreme Court as referenced in his Reply Affidavit to Yahoo's Motion to Dismiss and as referenced in their own policies wherein they normally comply with court orders as against third parties which have found defamation, libel, slander, trademark infringement, and any other types of findings mandating website link de-indexing or de-listing, and due to the indications by opposing counsel that the sole reason for non-compliance was for discriminatory or racist reasons against both the court order issuing judge and/or the litigant:

1. Defendants continue to use this forum to further harass, defame, slander and libel Plaintiff using the protected venue of this federal court, instead of simply having responded to Plaintiff's claims brought in state civil court;
2. A lower New York State Supreme Court found that the referenced postings online were defamatory, slanderous, libelous, infringing on trademarks, threatening, harassing, contained terrorist threats against Plaintiff and his children, and other claims, and issued 2 court orders thereon demanding that Google, Yahoo and Microsoft immediately remove/de-list/de-index those listings;
3. Instead Google, Yahoo, and Microsoft Bing chose to ignore those court orders from a NY Supreme Court Judge because he was African-American, and Plaintiff is also a minority, and they simply felt like not complying with those court orders;
4. Google, Yahoo and Microsoft counsel indicated that they only remove listings when they are from a White or Jewish Judge,

for White or Jewish litigants, because "they control the internet," and other races should "be damned," and that although they normally remove or de-index postings when there is a court order against third party defendants (as was the case here), they would not do so in the present case because the NY Supreme Court Judge making the order was African-American, and Plaintiff was Indian-American, both non-white and non-Jewish racial minorities;

5. Plaintiff hereby seeks to hold Google, Microsoft, and Yahoo in contempt of court for wilful non-compliance with 2 lawful court orders, and racist behavior against non-Jews and non-Whites;
6. This bullying of a NY Supreme Court Judge by Google, Yahoo and Microsoft/Bing, and browbeating eventually caused this African-American Judge to reverse his decision and withdraw his court orders and deny Plaintiff's claims, which he originally ruled in favor of;

WHEREFORE Plaintiff respectfully requests that the Court deny Defendants' Motion to Dismiss, seal the record owing to the sensitive nature of the case proceedings and due to Defendants' further harassment thereon, sanction the Defendants for vexatious and harassing litigation in the amount of \$100,000,000, order the de-indexing/de-listing of the offending links referenced herein, and/or remand the case back to the NY Civil State Court for speedy resolution and adjudication, and whatever other remedies this Honorable Court deems to be just and proper under the circumstances.

Respectfully submitted,

Dated: May 17, 2016
New York, New York

Rahul Manchanda, Esq

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ATTORNEY CERTIFICATION OF SERVICE

On May 17, 2016 the undersigned did deliver a copy of the attached Motion for Contempt to Attorney Dennis Wilson of Kilpatrick Townsend & Stockton LLP, The Grace Building, 1114 Avenue of the Americas, New York, NY 10036-7703 by ECF and US Mail, as well as all other named Defendants.

Rahul Manchanda, Esq.

Rahul Manchanda, Esq.