

JOHN O'GRADY
CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

HANA NAAS
406 EAST HARROGATE LOOP
WESTERVILLE, OH 43082-0000,

PLAINTIFF,

VS.

ANONYMIZER INC
#426
5694 MISSION CENTER ROAD
SAN DIEGO, CA 92108-0000,

DEFENDANT.

01CVC-12-12620

CASE NUMBER

**** SUMMONS ****

12/21/01

TO THE FOLLOWING NAMED DEFENDANT:

ANONYMIZER INC
#426
5694 MISSION CENTER ROAD
SAN DIEGO, CA 92108-0000

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: HANA NAAS
406 EAST HARROGATE LOOP
WESTERVILLE, OH 43082-0000,

PLAINTIFF(S)

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

TIMOTHY A. PIRTLE
ATTORNEY AT LAW
1380 ZOLLINGER ROAD
COLUMBUS, OH 43221-0000

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

JOHN O'GRADY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: JOHN HYKES, DEPUTY CLERK

JOHN O'GRADY
CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JUDGE J. BRUNNER

HANA NAAS
ET. AL.,

PLAINTIFF,

VS.

ANONYMIZER INC
ET. AL.,

DEFENDANT.

01CVC-12-12620

CASE NUMBER

CLERK'S ORIGINAL CASE SCHEDULE

| <u>CLERK'S ORIGINAL CASE SCHEDULE</u> | LATEST TIME OF OCCURRENCE |
|--|------------------------------|
| CASE FILED | 12/21/01 |
| INITIAL STATUS CONFERENCE | |
| INITIAL JOINT DISCLOSURE OF ALL WITNESSES | 05/10/02 |
| SUPPLEMENTAL JOINT DISCLOSURE OF ALL WITNESSES | 07/05/02 |
| TRIAL CONFIRMATION DATE | 07/19/02 |
| DISPOSITIVE MOTIONS | 09/27/02 |
| DISCOVERY CUT-OFF | 10/11/02 |
| DECISIONS ON MOTIONS | 11/22/02 |
| FINAL PRE-TRIAL CONFERENCE/ORDER (OR BOTH) | 12/06/02 0130PM |
| TRIAL ASSIGNMENT | 01/02/03 0900AM |

NOTICE TO ALL PARTIES

ALL ATTORNEYS AND PARTIES SHOULD MAKE THEMSELVES FAMILIAR WITH THE COURT'S LOCAL RULES, INCLUDING THOSE REFERRED TO IN THIS CASE SCHEDULE. IN ORDER TO COMPLY WITH THE CLERK'S CASE SCHEDULE, IT WILL BE NECESSARY FOR ATTORNEYS AND PARTIES TO PURSUE THEIR CASES VIGOROUSLY FROM THE DAY THE CASES ARE FILED. DISCOVERY MUST BE UNDERTAKEN PROMPTLY IN ORDER TO COMPLY WITH THE DATES LISTED IN THE RIGHT-HAND COLUMN.

BY ORDER OF THE COURT OF COMMON PLEAS,
FRANKLIN COUNTY, OHIO

____/____/____
DATE

JOHN O'GRADY, CLERK

(CIV363-S10)

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

Hana Naas
406 East Harrogate Loop
Westerville, Ohio 43082

Case No.

and

Judge Brunner

Suliman Dregia
406 East Harrogate Loop
Westerville, Ohio 43082

Plaintiffs,

vs

Anonymizer, Inc.
#426
5694 Mission Center Road
San Diego, California 92108,

and

Yousif Khaddar
address currently unknown,

and

John Doe #1,

John Doe #2,

John Doe #3,

Defendants.

RECITALS

Hana Naas is the spouse of Suliman Dregia, and the daughter
of Abdelrahim Naas.

COMPLAINT

FIRST CAUSE OF ACTION

DEFAMATION

1. Defendant John Doe posted numerous communications via the internet defaming Hana Naas

2. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of being sexually impure, using numerous words and phrases.
 3. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of abandoning her children and being an unfit mother
 4. Defendant John Doe posted numerous communications via the internet accusing Naas children of being of impure birth.
 - 5 Defendant John Doe posted numerous communications via the internet accusing Hana Naas of spying for foreign governments
 6. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of defaming third parties.
 - 7 Defendant John Doe posted numerous communications via the internet accusing Hana Naas of being untruthful.
 - 8 Defendant John Doe posted numerous communications via the internet defaming Hana Naas' father
 - 9 Defendants communicated that plaintiffs engaged in criminal conduct.
 - 10 Defendants had no expectation of profiting from this action and actions were solely vindictive and made with malice.
 - 11 The communications of defendants were untrue and/or malicious
 12. The communications of defendants were intended to injure plaintiffs' professional and business relationships
 13. The communications of defendants were injurious to plaintiffs' business relationships
 14. The communications of defendants were injurious to plaintiffs' professional reputation.
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15. The communications of defendants were injurious to plaintiffs' occupation.

16 The communications of defendants were intended to cause plaintiffs public ridicule.

17. The communications of defendants were intended to cause plaintiffs shame and disgrace.

18 The communications of defendants were intended to coerce plaintiffs

19. The communications of defendants are actionable per se.
The communications of defendant were intended to cause plaintiff damaged personal relationships.

SECOND CAUSE OF ACTION

DEFAMATION

Defendant John Doe posted numerous communications via the internet defaming Suliman Dregia

22 Defendant John Doe posted numerous communications via the internet accusing Hana Naas of being sexually impure, using numerous words and phrases

23. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of abandoning her children and being an unfit mother

24. Defendant John Doe posted numerous communications via the internet accusing Naas children of being of impure birth

25. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of spying for foreign governments

26. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of defaming third parties.

27. Defendant John Doe posted numerous communications via the internet accusing Hana Naas of being untruthful.

28 Defendant John Doe posted numerous communications via the internet stating that Suliman Dregia should divorce his wife Hana Naas

29. Defendants communicated that plaintiffs engaged in criminal conduct

30. Defendants had no expectation of profiting from this action and actions were solely vindictive and made with malice.

31. The communications of defendants were untrue and/or malicious

32. The communications of defendants were intended to injure plaintiffs' professional and business relationships

33. The communications of defendants were injurious to plaintiffs' business relationships.

34. The communications of defendants were injurious to plaintiffs' professional reputation.

35. The communications of defendants were injurious to plaintiffs' occupation.

36. The communications of defendants were intended to cause plaintiffs public ridicule

37 The communications of defendants were intended to cause plaintiffs shame and disgrace

38. The communications of defendants were intended to coerce plaintiffs

39. The communications of defendants are actionable per se

40. The communications of defendant were intended to cause plaintiff damaged personal relationships.

THIRD CAUSE OF ACTION

DEFAMATION

41. Defendant Anonymizer, Inc. facilitated the above communications of John Doe by controlling the connections to the servers and sites where the communications were posted

The communications facilitated by Anonymizer, Inc., included numerous communications via the internet accusing Hana Naas of being sexually impure, using numerous words and phrases, numerous communications via the internet accusing Hana Naas of abandoning her children and being an unfit mother, numerous communications via the internet accusing Naas children of being of impure birth, numerous communications via the internet accusing Hana Naas of spying for foreign governments, numerous communications via the internet accusing Hana Naas of defaming third parties, numerous communications via the internet accusing Hana Naas of being untruthful, communications defaming Hana Naas' father, and numerous communications via the internet stating that Suliman Dregia should divorce his wife Hana Naas.

43. Defendant profited from this action

The communications were untrue and/or malicious

45 The communications were intended to injure plaintiffs' professional and business relationships

46 The communications were injurious to plaintiffs' business relationships.

The communications were injurious to plaintiffs' professional reputation

48. The communications were injurious to plaintiffs' occupations

49. The communications were intended to cause plaintiffs public ridicule

50. The communications were intended to cause plaintiffs shame and disgrace

51. The communications were intended to coerce plaintiffs.

52. The communications are actionable per se

53. The communications of defendant were intended to cause plaintiff damaged personal relationships

FOURTH CAUSE OF ACTION

DEFAMATION

54. Defendant Yousif Khaddar aided John Doe in the above First, Second, and Third causes of action

FIFTH CAUSE OF ACTION

DEFAMATION

55. Defendants John Doe #1, John Doe #2, and John Doe #3 engaged in the above conducts and this complaint will be amended upon learning their identities and addresses

Plaintiffs demand damages in a dollar amount within this Court's jurisdiction, orders that defendants cease this conduct, attorney fees, and because of the defendants motivations punitive damages in an amount greater than compensatory damages, and other relief the Court deems proper.

Timothy A. Pirtle
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(614) 538-5375
(614) 538-5376 fax

Attested:

Suliman A. Dregia

Suliman Dregia

JURY DEMAND

Plaintiffs demand a jury of their peers in this action

Timothy A. Pirtle

Timothy A. Pirtle