## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA MACON DIVISION

TITI PIERCE,	)
Plaintiff,	) )
	) Case No. 5:16-CV-207 (LJA)
v.	)
	) TRIAL BY JURY DEMANDED
WARNER BROS.	)
ENTERTAINMENT, INC.	)
	)
Defendant.	)

#### **COMPLAINT**

COMES NOW Plaintiff, Titi Pierce, and states her Complaint against Defendant, Warner Bros. Entertainment, Inc. ("Warner Bros."), as follows:

#### INTRODUCTION

- 1. This Complaint arises from Defendant's intentional or reckless misconduct in connection with a segment entitled "What's Wrong with These Ads...and These Signs?" that aired on The Ellen DeGeneres Show ("the show") on February 22, 2016 and again on April 15, 2016 ("the segment").
- 2. During the segment, Defendant displayed a picture of one of Ms. Pierce's real estate signs (she is a real estate agent) and referred to Ms. Pierce as a derogatory term, specifically calling her "titty Pierce" instead of by her name "Titi Pierce."

- 3. In all of her 35 years of life, no one has ever referred to Ms. Pierce as "titty" until Defendant did so on February 22, 2016 on national television. Prior to Defendant's misdeeds, Ms. Pierce had been called only by her name "Titi," which, as grammar dictates, is pronounced "TEE TEE."
- 4. As intended, Defendant's name calling led to immediate ridicule and raucous laughter from the show's live and television audiences.
- 5. In addition to calling Ms. Pierce a derogatory term, Defendant also displayed Ms. Pierce's personal cell phone number on the screen for its national audience. Defendant did so even though it took the time to blur out a second phone number that appeared on the bottom of the real estate sign.
- 6. As a result, following the airing of the segment, Ms. Pierce—while in the midst of attending a family funeral out-of-state—began receiving ridiculing and harassing telephone calls and voice mail messages, which continued at all hours of the day and night.
- 7. In addition, Ms. Pierce and her family have faced repeated ridicule on the streets of her hometown (Warner Robins) regarding the segment.
- 8. Ms. Pierce reached out to Defendant multiple times after the segment first aired to inform Defendant that (1) Ms. Pierce's first name is "Titi" and not "titty"; (2) Ms. Pierce's personal cell phone number was displayed on national

television; and (3) Defendant's actions had caused Ms. Pierce much pain and suffering.

- 9. Defendant blurred out Ms. Pierce's personal telephone number on a video of the segment that was live on the show's website and eventually blurred out Ms. Pierce's personal telephone number on a video of the segment that was live on the show's Facebook page.
- 10. Despite actual notice of the false statements and the pain and suffering caused from those statements and the airing of Ms. Pierce's personal cell phone number, Defendant aired the segment again on April 15, 2016—still calling Ms. Pierce a derogatory term and still airing Ms. Pierce's personal cell phone number to the nation.
- 11. As a result of Defendant re-airing the segment, Ms. Pierce again received repeated ridiculing and harassing telephone calls and she and her family again faced ridicule and harassment on the streets of Warner Robins.

## **PARTIES**

- 12. Ms. Pierce is an individual who resides in Warner Robins, Georgia.
- 13. Warner Bros. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business being located at 400 Warner Boulevard, Burbank, California 91522.

14. Among its corporate activities, Warner Bros. produces and publishes
The Ellen DeGeneres Show.

## **JURISDICTION AND VENUE**

- 15. Ms. Pierce is a citizen of the State of Georgia for purposes of diversity jurisdiction under 28 U.S.C. § 1332.
- 16. Warner Bros. is a citizen of either Delaware or California for purposes of diversity jurisdiction under 28 U.S.C. § 1332.
- 17. This Court has original subject matter jurisdiction of this action pursuant to 28 U.S.C. § 1332 as there exists complete diversity of citizenship between Ms. Pierce and Warner Bros. and the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.
- 18. Viacom is subject to the jurisdiction of this Court pursuant to 28 U.S.C. § 1332.
  - 19. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

#### FACTUAL BACKGROUND

#### Ms. Pierce and her name

- 20. Titi Pierce is an electronics engineer at Robins Air Force Base in Warner Robins. She is also a real estate agent in the Warner Robins area.
- 21. As grammar dictates, Ms. Pierce's first name, "Titi," is pronounced "TEE TEE."

- 22. "Titi" is a Nigerian name that means "flower." Ms. Pierce's mother selected this name with care after consulting with a Nigerian book of names that her good friend shared with her. Ms. Pierce has strong, positive feelings toward her name for this reason.
  - 23. In her entire 35 years of life, no one has ever referred to her as "titty."
- 24. That all changed after Defendant invaded Ms. Pierce's privacy by airing a false, defamatory, and personally hurtful segment about her on February 22, 2016.

# Warner Bros. airs a segment on the Ellen DeGeneres Show that publicly humiliates Ms. Pierce

- 25. Warner Bros. publishes The Ellen DeGeneres Show to a nationwide audience.
- 26. On February 22, 2016, Defendant aired its "What's Wrong with These Ads...and These Signs?" segment for the first time.
- 27. The segment included a portion that consisted of a series of pre-taped photographs and Ms. DeGeneres's commentary, which was pre-planned as well.
- 28. The segment displayed one of Ms. Pierce's real estate signs with her name and personal cell phone number prominently displayed across the top. A second phone number appearing on the bottom of the sign was blurred out.

- 29. Just before showing Ms. Pierce's real estate sign, Defendant displayed a sign reading "Nipple Convalescent Home" to orient the audience toward thoughts of breasts.
- 30. While displaying the real estate sign, Ms. DeGeneres paused and said "titty Pierce, sounds like she might have spent some time in that nipple home, I don't know."
- 31. Simply showing the real estate sign with Ms. Pierce's name would likely not have garnered any laughter if Defendant had not first oriented the audience to elicit the response it desired, which was ridicule of and laughter toward Ms. Pierce.
- 32. Prior to the airing of the show and segment, Defendant developed its plan to orient the audience to ridicule and laugh at Ms. Pierce by displaying the "Nipple Convalescent Home" sign immediately prior to showing Ms. Pierce's real estate sign.
- 33. Without that orientation, it is unlikely anyone would have laughed when shown Ms. Pierce's real estate sign.
- 34. Ms. Pierce has lived her life as Titi for 35 years and until Defendant's malicious actions on February 22, 2016, no one has ever referred to her as "titty."
- 35. With the exception of the portion of the segment discussing Ms. Pierce, the entire segment referred to businesses and not individuals.

- 36. Ms. Pierce did not see the initial airing of the segment. At the time the segment first aired, she was traveling to a family funeral in Tampa, Florida.
- 37. While driving to Tampa, during the wake, and at the funeral itself, Ms. Pierce's personal cell phone rang constantly with out-of-state numbers she did not recognize.
- 38. She answered several of the telephone calls and when she did, she was met with cruel voices laughing uncontrollably, asking if she was a real person, and repeatedly shouting "titty Pierce."
- 39. Ms. Pierce was extremely confused, insulted, and was also personally grieving over the loss of her family member. Because of several callers telling her that they learned about her from The Ellen DeGeneres Show, she eventually learned of the full content of the segment.
- 40. After she stopped personally answering the barrage of telephone calls, she received several harassing and ridiculing voice mail messages.
- 41. One caller left a message explaining that Ellen DeGeneres was "smart enough" to display Ms. Pierce's real estate sign, but "not smart enough" to block out Ms. Pierce's personal cell phone number. The caller wanted Ms. Pierce to know that if she got "about a hundred thousand phone calls, that's why." And indeed, Ms. Pierce received many ridiculing and harassing telephone calls and voice mail messages.

- 42. One caller mockingly told Ms. Pierce in a voice mail message that her "size DD, 37 bra is ready."
- 43. One caller told Ms. Pierce in a condescending voice mail message that she should change her name.
- 44. One caller left this repugnant message for her: "Bahhh, your name is titty Pierce, Bahhh, Bahhh, titty, Bahhh, Ellen DeGeneres told me to call you, Bahhh."
- 45. Ms. Pierce also received multiple ridiculing and harassing text messages as a result of the segment.
- 46. Ms. Pierce's co-workers also had to field multiple ridiculing and harassing telephone calls following Defendant's airing of the segment. The real estate office where Ms. Pierce works as an agent received so many telephone calls that it was forced to issue the following statement on its company Facebook page to try to ward off callers: "Loving that our own Titi Pierce of CBRF [Coldwell Banker Robbins & Free] was on the Ellen DeGeneres show, but wish it was because they knew how fabulous and classy Titi is and not to poke fun. We love you Titi and are proud to have you in the CBRF Family."
- 47. Once Ms. Pierce was back in Warner Robins, she was forced to endure repeated ridicule on the streets of her hometown.
  - 48. People repeatedly approached Ms. Pierce on the street to laugh at her.

- 49. Ms. Pierce experienced repeated ridicule at work about the segment.
- 50. Ms. Pierce's husband also was forced to endure repeated ridiculing comments about his wife.
- 51. One of her fellow real estate agents informed her that people were talking about the segment all over town and that several people had posted about it on Facebook.
- 52. Ms. Pierce does not have a Facebook account so she asked her niece show her the post, which linked to the show's Facebook page and a video of the segment.
  - 53. The comments were mostly vile and very hurtful to read.
- 54. One of Ms. Pierce's friends had commented directly to the show's Facebook post that it had Ms. Pierce's name wrong and that Ms. Pierce was a "real person with real feelings." Yet the show was not deterred from continuing to promote the segment.

## Ms. Pierce directly informs The Ellen DeGeneres Show that she was humiliated by the segment and that they got her name wrong

55. Ms. Pierce reached out to Defendant twice after the segment initially aired seeking redress from its malicious conduct—first on February 24, 2016 and again on March 14, 2016.

- 56. Ms. Pierce informed Defendant that her first name was pronounced "TEE TEE" and not "titty," even though the rules of grammar should have so informed Defendant.
- 57. Ms. Pierce also called Defendant's attention to the fact that while Defendant had blurred out a second telephone number on the bottom of the real estate sign, it prominently displayed Ms. Pierce's personal cell phone number, which the show's television audience had seen and used to repeatedly ridicule and harass Ms. Pierce.
- 58. Defendant blurred out Ms. Pierce's personal telephone number on a video of the segment that was live on the show's website and eventually blurred out Ms. Pierce's personal telephone number on a video of the segment that was live on the show's Facebook page.
- 59. Ms. Pierce also asked Defendant to cease and desist from further reference to her on the show or social media.

## Despite direct knowledge of its wrongs and the resulting harm, Defendant repeated the segment on The Ellen DeGeneres Show with no changes

60. Defendant was aware of how to pronounce the name "Titi" prior to airing the segment on February 22, 2016. But at least as of February 24, 2016, Defendant was on direct notice from Ms. Pierce that Defendant had not called Ms. Pierce by the correct name in the segment.

- 61. Defendant knew that it wrongfully displayed Ms. Pierce's personal cell phone number to a national television audience prior to airing the segment on February 22, 2016. But at least as of February 24, 2016, Defendant was on direct notice from Ms. Pierce that Defendant had prominently displayed her personal cell phone number to the nation.
- 62. Despite this direct knowledge, on April 15, 2016, Defendant again aired the offending segment without making any changes. The portion of the segment displaying Ms. Pierce's real estate sign, including her personal cell phone number, and calling Ms. Pierce a derogatory term, remained.
- 63. As a result, Ms. Pierce again received repeated ridiculing and harassing telephone calls. And Ms. Pierce and her family were forced to endure a fresh assault in social media and around her hometown.

## **CLAIMS FOR RELIEF**

## **COUNT I – FALSE LIGHT INVASION OF PRIVACY**

- 64. Ms. Pierce incorporates by reference paragraphs 1-63 of this Complaint as though the same were set forth herein in their entirety.
- 65. Defendant invaded Ms. Pierce's privacy when it splashed a real estate sign containing her name and personal cell phone number across the nation's television screens while calling her a derogatory term to invoke laughter and ridicule during a segment of the Ellen DeGeneres Show on February 22, 2016.

- 66. Ms. Pierce's first name is Titi.
- 67. As grammar dictates, Ms. Pierce's first name is pronounced "TEE TEE."
  - 68. Ms. Pierce's first name is not pronounced "titty."
- 69. Defendant knew Ms. Pierce's name was not pronounced "titty."

  Thus, it oriented the audience toward this pronunciation by showing a sign displaying the word "nipple" just before showing Ms. Pierce's real estate sign.
- 70. Defendant invited the television audience to draw a false connection between Ms. Pierce and a "nipple house" by wondering aloud as to whether Ms. Pierce had visited a "nipple home."
- 71. The gist of the segment was that Ms. Pierce's name was the act of piercing a human nipple.
- 72. It is highly offensive to an ordinary person to be called "titty" on national television.
- 73. It was highly offensive to Ms. Pierce to be called "titty" on national television.
- 74. Defendant knew it was an invasion of Ms. Pierce's privacy to display her personal cell phone number.
- 75. Indeed, Defendant blurred out another phone number appearing on the same real estate sign showing Ms. Pierce's personal cell phone number.

- 76. After repeated communications on behalf of Ms. Pierce asking that her personal cell phone number not be displayed, Defendant blurred out Ms. Pierce's personal cell phone number on the show's website and social media site.
- 77. However, Defendant aired the segment again on April 15, 2016, again showing Ms. Pierce's personal cell phone number with no blurring.
- 78. Despite repeated communications on behalf of Ms. Pierce directly informing Defendant of Ms. Pierce's correct name, Defendant aired the segment again on April 15, 2016, again calling Ms. Pierce a derogatory term instead of by her name.
- 79. Defendant knew or should have known how to pronounce Ms. Pierce's first name prior to airing the segment in which Defendant referred to Ms. Pierce by a derogatory term that exposed her to ridicule and humiliated her across the country and in her hometown.
- 80. Defendant published the segment calling Ms. Pierce a derogatory term while at the same time advertising her personal cell phone number to a national television audience and profited therefrom.
- 81. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered public ridicule, which has harmed her both professionally and personally.

- 82. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered stress, emotional distress, embarrassment, humiliation, anger, and other mental pain and suffering.
- 83. Defendant's conduct demonstrates willful misconduct and an entire want of care that raises a conscious indifference to consequences.
- 84. Ms. Pierce is also entitled to an award of punitive damages from Defendant in order to punish it for its unlawful conduct and to penalize and deter it from repeating such unlawful and egregious conduct.

#### **COUNT II – MISAPPROPRIATION OF LIKENESS**

- 85. Ms. Pierce incorporates by reference paragraphs 1-84 of this Complaint as though the same were set forth herein in their entirety.
- 86. Defendant appropriated Ms. Pierce's identity, particularly her name and personal cell phone number for its use in ridiculing Ms. Pierce by calling her a derogatory term during a segment of the Ellen DeGeneres Show that aired on February 22, 2016 and again on April 15, 2016.
- 87. Defendant displayed Ms. Pierce's name and personal cell phone number without her knowledge or permission.
- 88. Defendant published the segment calling Ms. Pierce a derogatory term while at the same time advertising her personal cell phone number to a national television audience and profited therefrom.

- 89. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered public ridicule, which has harmed her both professionally and personally.
- 90. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered stress, emotional distress, embarrassment, humiliation, anger, and other mental pain and suffering.
- 91. Defendant's conduct demonstrates willful misconduct and an entire want of care that raises a conscious indifference to consequences.
- 92. Ms. Pierce is also entitled to an award of punitive damages from

  Defendant in order to punish it for its unlawful conduct and to penalize and deter it

  from repeating such unlawful and egregious conduct.

## **COUNT III - DEFAMATION**

- 93. Ms. Pierce incorporates by reference paragraphs 1-92 of this Complaint as though the same were set forth herein in their entirety.
- 94. Defendant intentionally or recklessly called Ms. Pierce a derogatory term to invoke laughter and ridicule during a segment of The Ellen DeGeneres Show on February 22, 2016.
  - 95. Ms. Pierce's first name is Titi.
- 96. As grammar dictates, Ms. Pierce's first name is pronounced "TEE TEE."

- 97. Ms. Pierce's first name is not pronounced "titty"
- 98. Defendant referred to Ms. Pierce as "titty" instead of her actual first name, which is "Titi."
- 99. It was false and derogatory of Defendant to refer to Ms. Pierce as "titty."
- 100. Defendant knew Ms. Pierce's name was not pronounced "titty."

  Thus, it oriented the audience toward this pronunciation by showing a sign displaying the word "nipple" just before showing Ms. Pierce's real estate sign.
- 101. Defendant invited the television audience to draw a false connection between Ms. Pierce and a "nipple home" by wondering aloud as to whether Ms. Pierce had visited a "nipple home."
- 102. The gist of the segment was that Ms. Pierce's name was the act of piercing a human nipple.
  - 103. Defendant knew it was derogatory to refer to Ms. Pierce as "titty."
- 104. Defendant knew that referring to Ms. Pierce as "titty" would expose Ms. Pierce to public ridicule.
- 105. Indeed, it was Defendant's purpose to ridicule Ms. Pierce during the segment.
- 106. Defendant not only intended and knew that Ms. Pierce would suffer public ridicule as a result of calling her "titty," but also Defendant explicitly

invited a television audience to contact Ms. Pierce and ridicule her "voice to voice" by displaying her personal cell phone number to the nation.

- 107. Defendant blurred out another phone number appearing on the same real estate sign, but not Ms. Pierce's personal cell phone number.
- 108. After repeated communications on behalf of Ms. Pierce asking that her personal cell phone number not be displayed, Defendant blurred out Ms. Pierce's personal cell phone number on the show's website and social media site.
- 109. However, Defendant aired the segment again on April 15, 2016, again intentionally showing Ms. Pierce's personal cell phone number with no blurring.
- 110. Despite repeated communications on behalf of Ms. Pierce directly informing Defendant of Ms. Pierce's correct name, Defendant aired the segment again on April 15, 2016 without any changes.
- 111. As a direct and proximate result of Defendant's actions in airing the segment on April 15, 2016, Ms. Pierce was ridiculed across the nation and in her hometown.
- 112. Defendant knew or should have known how to pronounce Ms.

  Pierce's first name prior to airing the segment in which Defendant referred to Ms.

  Pierce by a derogatory term that exposed her to ridicule and humiliated her across the country and in her hometown.

- 113. Defendant published the segment calling Ms. Pierce a derogatory term to third parties and the segment was, in fact, viewed by third parties all across the United States.
- 114. As a direct and proximate result of the false and defamatory statements about Ms. Pierce, her personal and professional reputations have been permanently damaged.
- 115. As a direct and proximate result of the false and defamatory statements about Ms. Pierce, she has suffered special damages.
- 116. As a direct and proximate result of Defendant's false and defamatory statements, Ms. Pierce has suffered public ridicule, which has harmed her both professionally and personally.
- 117. As a direct and proximate result of Defendant's false and defamatory statements, Ms. Pierce has suffered stress, emotional distress, embarrassment, humiliation, anger, and other mental pain and suffering.
- 118. Defendant's conduct demonstrates willful misconduct and an entire want of care that raises a conscious indifference to consequences.
- 119. Ms. Pierce is also entitled to an award of punitive damages from Defendant in order to punish it for its unlawful conduct and to penalize and deter it from repeating such unlawful and egregious conduct.

#### COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 120. Ms. Pierce incorporates by reference paragraphs 1-119 of this Complaint as though the same were set forth herein in their entirety.
- 121. Defendant intentionally or recklessly called Ms. Pierce a derogatory term to invoke laughter and ridicule during a segment of The Ellen DeGeneres Show on February 22, 2016.
- 122. As a direct and proximate result of Defendant's actions in airing the segment on February 22, 2016, Ms. Pierce was ridiculed across the nation and in her hometown.
  - 123. Ms. Pierce's first name is Titi.
- 124. As grammar dictates, Ms. Pierce's first name is pronounced "TEE TEE."
  - 125. Ms. Pierce's first name is not pronounced "titty."
- 126. Defendant knew Ms. Pierce's name was not pronounced "titty."

  Thus, it oriented the audience toward this pronunciation by showing a sign displaying the word "nipple" just before showing Ms. Pierce's real estate sign.
- 127. Defendant invited the television audience to draw a false connection between Ms. Pierce and a "nipple home" by wondering aloud as to whether Ms. Pierce had visited a "nipple home."

- 128. The gist of the segment was that Ms. Pierce's name was the act of piercing a human nipple.
- 129. It is highly offensive to an ordinary person to be called "titty" on national television.
- 130. It was highly offensive to Ms. Pierce to be called "titty" on national television.
- 131. Defendant knew it would inflict emotional distress upon Ms. Pierce by displaying her personal cell phone number to a national audience.
- 132. Indeed, Defendant blurred out another phone number appearing on the same real estate sign showing Ms. Pierce's personal cell phone number.
- 133. After repeated communications on behalf of Ms. Pierce asking that her personal cell phone number not be displayed, Defendant blurred out Ms. Pierce's personal cell phone number on the show's website and social media site.
- 134. However, Defendant aired the segment again on April 15, 2016, again intentionally showing Ms. Pierce's personal cell phone number with no blurring.
- 135. Despite repeated communications on behalf of Ms. Pierce directly informing Defendant of Ms. Pierce's correct name, Defendant aired the segment again on April 15, 2016 without any changes.

- 136. As a direct and proximate result of Defendant's actions in airing the segment on April 15, 2016, Ms. Pierce was ridiculed across the nation and in her hometown.
- 137. Defendant knew or should have known how to pronounce Ms.

  Pierce's first name prior to airing the segment in which Defendant referred to Ms.

  Pierce by a derogatory term that exposed her to ridicule and humiliated her across the country and in her hometown.
- 138. Defendant published the segment calling Ms. Pierce a derogatory term while at the same time advertising her personal cell phone number to a national television audience and profited therefrom.
- 139. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered public ridicule, which has harmed her both professionally and personally.
- 140. As a direct and proximate result of Defendant's conduct, Ms. Pierce has suffered stress, emotional distress, embarrassment, humiliation, anger, and other mental pain and suffering.
- 141. Ms. Pierce is also entitled to an award of punitive damages from Defendant in order to punish it for its unlawful conduct and to penalize and deter it from repeating such unlawful and egregious conduct.

## **CLAIM FOR RELIEF**

- 142. Ms. Pierce demands:
- (a) Trial by jury;
- (b) That judgment be entered against Defendant for compensatory damages in an amount to be determined at trial;
- (c) That judgment be entered against Defendant for punitive damages to punish and penalize Defendant and deter Defendant from repeating its unlawful conduct in an amount to be determined at trial;
- (d) That Defendant cease and desist from further publication of the segment on television or any websites or social media that it controls;
- (e) That all costs of this action be assessed against Defendant; and
- (f) That this Court award such other relief as it deems equitable, just, and proper.

Respectfully submitted this 2nd day of June 2016.

/s/ Stacey Godfrey Evans Stacey Godfrey Evans stacey@sgevanslaw.com Georgia Bar No. 298555

S.G. Evans Law, LLC 1180 West Peachtree Street Suite 2400 Atlanta, Georgia 30309 404-891-1402 678-868-1230 (fax)

RECEIPT #

AMOUNT

## Case 5:16-cv-00207 Document 1 Filed 06/02/16 Page 1 of 1

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

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I. (a) PLAINTIFFS Titl Pierce			DEFENDANTS Warner Bros. Entertainment, Inc.			
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II. BASIS OF JURISDI	CTION (Place an "X" in O	ne Box Only)			IPAL PARTIES	(Place an "X" in One Box for Plaintig
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IV. NATURE OF SUIT		whole				
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VI. CAUSE OF ACTION VII. REQUESTED IN	Cite the U.S. Civil Sta 28 U.S.C. § 1332  Brief description of ca false light invasio	Appellate Court tute under which you are suse: n of privacy; misappr IS A CLASS ACTION	Reopened filing (Do not cite jurisd		less diversity):  n; intentional inflicti  CHECK YES only	ion of emotional distress
COMPLAINT: VIII. RELATED CASI IF ANY	UNDER RULE 2  E(S)  (See instructions):	JUDGE		DC	JURY DEMAND:	Yes □ No
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FOR OFFICE USE ONLY						

APPLYING IFP

JUDGE

MAG. JUDGE