

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ANGELE BRILIHON BOLOU ABODO,

PLAINTIFF,

-against-

GOOGLE ., YAHOO., & BING.,

DEFENDANTS.

INDEX NO.:

Date Summons Filed :
Plaintiffs Designate New York County
as the Place of Trial
Basis of Venue is : Plaintiff's
Residence.

SUMMONS

Plaintiff resides in New York County

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiff's Attorney within (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated : Wappingers Falls, New York

January 1, 2017



Ryanne Konan, Esq.
Attorney for Plaintiffs
4 Marshall Rd, Suite 107
Wappingers Falls, NY 12590
(888)536-1434

Defendant's Address:
GOOGLE
111 Eight Avenue
New York, NY 10011

YAHOO
229 West 43 Street
New York, NY 10036

BING
11 Times Squares
New York, NY 10036

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**VERIFIED COMPLAINT FOR
DECLARATORY JUDGMENT
AND INJUNCTION RELIEF**

TO THE ABOVE NAMED DEFENDANTS:

Plaintiff, by her attorney, RYANNE G. KONAN, ESQ., complaining of the defendants herein, respectfully shows to this court, and alleges as follows:

FOR A CAUSE OF ACTION IN FAVOR OF ANGELE BRILIHON BOLOU ABODO

1. That at all times herein mentioned, the Plaintiff, Angele Brilihon Bolou Abodo was and still is a resident of New York City, County of New York, State of New York.
2. That at all times herein mentioned, the Plaintiff's name, Angle Brilihon Bolou Abodo, is unique and exclusively belongs to Plaintiff.
3. That at all times herein mentioned, the Plaintiff's name gets its originality from Africa, Ivory Coast, and Plaintiff is the unique person bearing the combination names of Angele Brilihon Bolou Abodo.
4. That at all times herein mentioned, Plaintiff was and still is a student at New York University (NYU) wherein Plaintiff studied and still is studying Psychology.
5. That at all times herein mentioned, GOOGLE was and still is a corporation which is a guide to digital information discovery, focused on informing, connecting, and entertaining through its search, communications, and digital content products, having a place of business at the following address: 111 Eight Avenue, New York, NY 10011.
6. That at all times hereinafter mentioned, GOOGLE was and still is doing business in New York.
7. That at all times hereinafter mentioned, GOOGLE maintained and still maintains offices or stores in New York continuously staffed with one or more employees.

8. That at all times hereinafter mentioned, GOOGLE had and still has agents and employees in New York engaging in business for the corporation on the continuous, regular and systematic basis.
9. That at all times hereinafter mentioned, GOOGLE was and still is a web search engine.
10. That at all times hereinafter mentioned, the Defendant, YAHOO was and still is a guide to digital information discovery, focused on informing, connecting, and entertaining through its search, communication, and digital content products, having a place of business at the following address: 229 West 43 Street, New York, NY 10036.
11. That at all times hereinafter mentioned, YAHOO was and still is doing business in New York.
12. That at all times hereinafter mentioned, YAHOO maintained and still maintains offices or stores in New York continuously staffed with one or more employees.
13. That at all times hereinafter mentioned, YAHOO had and still has agents and employees in New York engaging in business for the corporation on the continuous, regular and systematic basis.
14. That at all times hereinafter mentioned, the Defendant, Yahoo was and still is a guide to digital information discovery, focused on informing, connecting, and entertaining through its search, communication, and digital content products.
15. That at all times hereinafter mentioned, Yahoo was and still is a web search engine.
16. That at all times hereinafter mentioned, the Defendant, BING, was and still is a guide to digital information discovery, focused on informing, connecting, and entertaining through its search, communication, and digital content products, having a place of business at the following address: 11 Times Square, New York, New York, NY 10036.
17. That at all times hereinafter mentioned, BING was and still is doing business in New York.
18. That at all times hereinafter mentioned, BING maintained and still maintains offices or stores in New York continuously staffed with one or more employees.
19. That at all times hereinafter mentioned, BING had and still has agents and employees in New York engaging in business for the corporation on the continuous, regular and systematic basis.
20. That at all times hereinafter mentioned, the Defendant, BING was and still is a guide to digital information discovery, focused on informing, connecting, and entertaining through its search, communication, and digital content products.

21. That at all times hereinafter mentioned, GOOGLE was and still is a web search engine operated by MICROSOFT.
22. That Plaintiff, is a female, and was in a relationship with a certain male named Sheldon Moulton on or about May 2015.
23. That on or about November 2015, Sheldon Moulton, angry because Plaintiff had ended the relationship, published sexual tapes, secretly recorded by Moulton, on several pornographic websites.
24. That Plaintiff contacted all the pornographic websites, and all pornographic videos were removed from the pornographic websites.
25. That Plaintiff contacted Defendants, Google, Yahoo, and Bing to remove the name ANGELE BRILIHON BOLOU ABODO from Defendants' web search engine.
26. That the search of Plaintiff's full name on Defendants' website led and still leads to lewd and pornographic videos of the Plaintiff, and other derogatory comments aimed at Plaintiff and containing Plaintiff's full name.
27. That Plaintiff has been unable to obtain employment.
28. That Plaintiff's reputation has been tarnished as result of.
29. That Defendants have ignored Plaintiff's request.

WHEREFORE, plaintiff prays for a judgment against defendants and each of them, under CPLR 6301 as follows:

- a. For a declaration that Defendants remove Plaintiff's full name from their search engine.
- b. For such other and further relief as the court deems proper.

Dated: At Wappingers Falls, New York

December 12, 2016

Yours, etc.

RYANNE G. KONAN, ESQ.

By: 

Ryanne G. Konan, Esq.

Attorney for Plaintiff

4 Marshall Road Suite 107

Wappingers Falls, NY 12590

Ph.: (888) 536-1434

Fax: (845)231-0508

~~December 12, 2016~~

Verification

I hereby certify that all statements made in the foregoing complaint are true to the best of my knowledge and belief. I am aware that willful false statement can subject me to punishment under the law.

Plaintiff's Signature



ANGELE BRILIHON BOLOU ABODO

Date

12/13/2016

Subscribed and sworn to before me on this 13th day of December 2016



Notary

