

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE
COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: _____

CITY OF CORAL GABLES,
a Florida municipal corporation,

Petitioner,

vs.

INSTAGRAM, LLC and
FACEBOOK MIAMI, INC.,

Respondent.

_____/

COMPLAINT FOR PURE BILL OF DISCOVERY

Petitioner, the City of Coral Gables (“City”), a Florida municipal corporation, hereby submits this Pure Bill of Discovery requesting an Order permitting Petitioner and its counsel to inspect and document evidence in the case and order directing discovery responses to requests for production relevant to a potential legal action, and states:

BACKGROUND


1. This is an equitable action seeking discovery pursuant to the Court’s equitable powers and jurisdiction.
2. The City is a Florida municipal corporation and is *sui juris*.
3. Respondent Instagram, LLC (“Instagram”) is a Delaware limited liability company with its principal place of business located in Menlo Park, California.

4. Respondent Facebook Miami, Inc. (“Facebook”) is a foreign for profit corporation registered to do business in the state of Florida, also with its principal place of business located in Menlo Park, California.

5. On or around May 2017 and continuing through the present date, an ad under the name “Protect Coral Gables” has been featured on Instagram, a screenshot of which is attached hereto as Exhibit “A” (“Instagram Ad”).

6. Also on or around May 2017 through June 2017, a Facebook page under the name “Protect Coral Gables” was opened. Subsequently, another Facebook page under the name of “Coral Gables Residents Who Care.” appeared in June 2017 and continuing through the present date, screenshots of which are attached hereto as Composite Exhibit “B” (the “Facebook Pages”).



7. The Instagram Ad contains an emblem (“”) that is a trademark owned by the City, which is registered under No. 4,307,912 with the United States Patent and Trademark Office (“PTO”) (the “City Emblem”). See trademark attached hereto as Exhibit “C”.

8. The initial Facebook Page for Protect Coral Gables also featured the City Emblem. *See Ex. B*, page 1.

9. Further, the Instagram Ad contains content that is erroneous and misleading, including a video of an attack on a woman. *See Ex. A*.

10. Similarly, the Facebook Pages ran sponsored content on Facebook subscribers’ news feeds featuring the same erroneous and misleading video depicting the attack on a woman (“Facebook Video”). A screenshot of the Facebook Video is attached hereto as Exhibit “D”.

11. City has requested Respondent Instagram to (1) cease and desist from allowing the use of the City Emblem on the Instagram Ad; and (2) remove the offensive, misleading and

erroneous Instagram Ad from its social media platform, but Respondent has refused to date. *See* Correspondence between Petitioner and Respondent Instagram attached hereto as Composite Exhibit “E”.

12. City has also requested that Respondent Instagram provide it with information on the identity of the publisher of the offensive Instagram Ad since that information is not readily available from the Instagram Ad. This request was made at Respondent’s suggestions. *See Ex. E.* However, to date, Respondent has failed and/or refused to provide the information absent a court order.

13. City requested Respondent Facebook that it cease and desist from allowing the use of the City Emblem on the Facebook Pages and Facebook Video. A copy of the letter to Facebook is attached hereto as Exhibit “F”. Following this request, the Protect Coral Gables Page was taken down and replaced with the “Coral Gables Residents Who Care.”. However, the Facebook Video still appeared under the “Coral Gables Residents Who Care.” name.

14. Florida law permits parties to file a pure bill of discovery to get otherwise unavailable information that is needed to file suit against appropriate defendants. *Campbell v. Knight*, 92 Fla. 246, 252 (Fla. 1926); *Debt Settlement Administrators, LLC v. Antigua and Barbuda*, 950 So.2d 464, 465 (Fla. 3d DCA 2007).

15. Petitioner requires this limited and necessary information on the party or parties responsible for the impermissible use of the City Emblem and publication of the misleading information so that City may pursue potential claims against same.

16. Petitioner will suffer irreparable harm if it is unable to determine the identity of the entity, person or persons responsible for misuse of the City Emblem and publishing misleading and erroneous, offensive content that casts the City in a false light.

17. There is no adequate remedy at law.

DOCUMENTS AND INFORMATION REQUESTED

18. Petitioner needs the following requested information to determine the identity of potential defendants in an action (1) to send a cease and desist letter in accordance with the City’s Code¹; (2) for injunctive and other relief related to trademark infringement and/or (3) defamation:

a. From Respondent Instagram:

i. Any and all records identifying the name, address, telephone number of the entity and/or individual(s) responsible for publishing the Instagram Ad “Protect Coral Gables” on its social media platform.

b. From Respondent Facebook:

i. Any and all records identifying the name, address, telephone number of the entity and/or individual(s) responsible for publishing the Facebook Pages “Protect Coral Gables” and “Coral Gables Residents Who Care.” on its social media platform.

ii. Any and all records identifying the name, address, telephone number of the entity and/or individual(s) responsible for publishing the Facebook Video on its social media platform.

WHEREFORE, Petitioner, City of Coral Gables, respectfully requests this Court order Respondents Instagram and Facebook to provide the undersigned counsel for the Petitioner, the documents and items listed above within thirty (30) days of the service of this bill. Petitioner

¹ Respondent Instagram indicated an unwillingness to remove the Instagram Ad despite it containing the City Emblem and the City’s cease and desist letter pursuant to City Ordinance 2016-059. *See Ex. E*. Thus, Petitioner will need to separately serve a cease and desist letter on the individuals or groups responsible for the Instagram Ad to further enforce its municipal code.

further request that this Court grant such additional discovery as may be determined just and proper.

Dated this 20th day of July, 2017.

Respectfully submitted,

HOLLAND & KNIGHT LLP
Special Counsel for City of Coral Gables
701 Brickell Avenue, Suite 3300
Miami, Florida 33131
Tel. 305.789.7467
Direct fax: 305.679.6355

By: s/Anna Marie Gamez
Anna Marie Gamez, Esq. (FBN 502911)
Email: annie.hernandezgamez@hkllaw.com
Secondary email: maria.gonzalez@hkllaw.com

CITY OF CORAL GABLES
City Attorney
Office of the City Attorney
405 Biltmore Way
Coral Gables, Florida 33134
Tel: 305.460.5218
Fax: 305.460.5264

By: s/Craig E. Leen
Craig E. Leen, Esq. (FBN 701696)
Email: cleen@coralgables.com

EXHIBIT A



KEEP CORAL GABLES SAFE

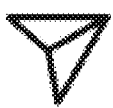
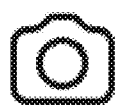
Call your elected officials and tell them to step up to the plate and protect our families.

CALL 305-460-5323

Comm. Frank Quesada, Comm. Michael Mena
Comm. Patricia Keon, Comm. Vince Lago
Mayor Valdes-Fauli



59 views



59 views

**\$610,000 TAX DOLLARS WASTED
ON SECURITY GUARDS IN CORAL
GABLES!**

This is happening now! Watch how the security guards can only watch as girl is beaten and call for Police and wait for them to arrive. Don't let this happen in Coral Gables.

Call your elected officials and tell them to step up to the plate and protect our families. Demand they hire Certified Police Officers!

CALL 305-460-5323

Comm. Frank Quesada, Comm.

Michael Mena, Comm. Patricia

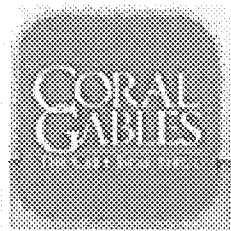
Keon, Comm. Vince Lago, Mayor

Valdes-Fauli

**COMPOSITE
EXHIBIT B**


Email or Phone Password

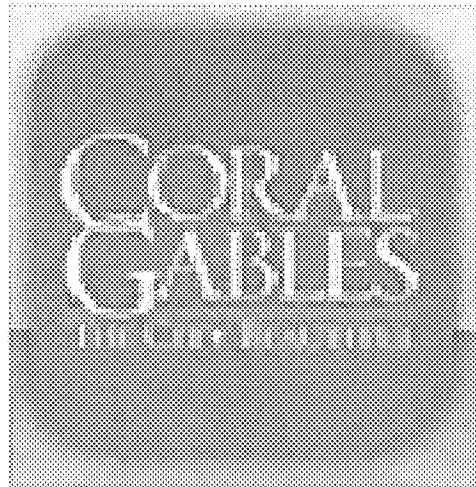
[Forgot account?](#)



[Like](#) [Share](#) [Suggest Edits](#)

[Send Message](#)

 Protect Coral Gables updated their profile picture
20 hrs



[Like](#) [Comment](#)




Protect Coral Gables

- [Home](#)
- [Posts](#)
- [Photos](#)
- [About](#)
- [Likes](#)

[Create a Page](#)


Community Services

Community

-  Invite your friends to like this Page
-  2 people like this
-  2 people follow this

About

[See All](#)

 Community Services

People

 2 likes

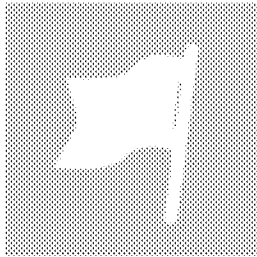
English (US) · Español · Português (Brasil) · Français (France) · Deutsch

[Privacy](#) · [Terms](#) · [Advertising](#) · [Ad Choices](#)
[Cookies](#) · [More](#)
Facebook © 2017

See more of Protect Coral Gables by logging into Facebook

Message this Page, learn about upcoming events and more:

or



Coral Gables residents who care.

[Message](#)



Like



Follow



Share



Save

Community

Home

About

Photos

Posts

Community



Write something on the Page

EXHIBIT C

United States of America
United States Patent and Trademark Office

CORAL
GABLES
THE CITY BEAUTIFUL

Reg. No. 4,307,912

Registered Mar. 26, 2013

Int. Cl.: 35

SERVICE MARK

PRINCIPAL REGISTER

CITY OF CORAL GABLES (FLORIDA MUNICIPAL CORPORATION)
405 BILTMORE WAY
CORAL GABLES, FL. 33134

FOR: PROMOTING THE BUSINESS, COMMUNITY, CULTURAL, HISTORIC, MUNICIPAL AND CIVIC INTERESTS OF THE CITY OF CORAL GABLES, FLORIDA; PROMOTING TOURISM, BUSINESS, RESIDENTIAL AND COMMERCIAL GROWTH, ECONOMIC DEVELOPMENT, CULTURAL AND HISTORIC ATTRACTIONS, AND GOVERNMENT SERVICES IN THE CITY OF CORAL GABLES, FLORIDA; PROVIDING DEMOGRAPHIC INFORMATION VIA A GLOBAL COMPUTER NETWORK ABOUT RESIDENTIAL AND COMMERCIAL GROWTH, ECONOMIC AND BUSINESS DEVELOPMENT SERVICES, CULTURAL AND HISTORIC ATTRACTIONS, AND GOVERNMENT SERVICES AND EMPLOYMENT OPPORTUNITIES IN THE CITY OF CORAL GABLES, FLORIDA, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 12-0-2004; IN COMMERCE 12-0-2004.

OWNER OF U.S. REG. NOS. 3,048,803, 3,583,791, AND 4,123,335.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CORAL GABLES" AND "CITY", APART FROM THE MARK AS SHOWN.

THE MARK CONSISTS OF THE WORD "CORAL" APPEARS ABOVE THE WORD "GABLES" IN CAPITALIZED, STYLIZED TEXT. THERE IS AN UNDERSCORE UNDER THE WORD "GABLES". BENEATH THE UNDERSCORES, THE WORDS "THE CITY BEAUTIFUL" APPEAR IN CAPITALIZED, STYLIZED TEXT.

SER. NO. 85-583,939, FILED 3-29-2012.

LIEF MARTIN, EXAMINING ATTORNEY



Lief Martin

Acting Director of the United States Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*

What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

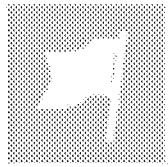
The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

**The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or
reminder of these filing requirements.**

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

EXHIBIT D



Coral Gables residents who care.



Sponsored ·

\$610,000 TAX DOLLARS WASTED ON SECURITY GUARDS IN CORAL GABLES!

This is happening now! Watch how the security guards can only watch as girl is beaten and call for Police and wait for them to arrive. Don't let this happen in Coral Gables... [Continue Reading](#)

Watch how the security guards can only watch while girl is beaten

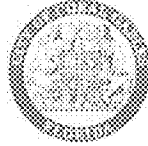


**COMPOSITE
EXHIBIT E**

060617-1

THE CITY OF CORAL GABLES

OFFICE OF
THE CITY ATTORNEY



The City Beautiful

CITY HALL 405 BILTMORE WAY
CORAL GABLES, FLORIDA 33134

May 26, 2017

Instagram
Corporate Headquarters
General Counsel/Legal Department
200 Jefferson Drive
Menlo Park, CA 94025

RE: "Protect Coral Gables" Instagram page/ad

Instagram General Counsel,

It has come to the attention of the City of Coral Gables that an Instagram page/ad exists under the name "Protect Coral Gables." The page/ad contains an emblem that is a trademark owned by the City of Coral Gables (see attached as Exhibit A). The trademark is registered in the United States (Registration No. 4,307,912). Further, the page/ad contains content that is erroneous and misleading, including a video of an attack on a woman.

We, therefore, order that your company immediately cease and desist from allowing the use of our trademarked logo on the "Protect Coral Gables" Instagram page/ad and remove the erroneous and misleading content contained in the page/ad. Pursuant to Coral Gables Ordinance 2016-059, failure to comply with this letter will subject Instagram to a code enforcement citation carrying a fine of \$500 per day of violation.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Ramos".

Miriam S. Ramos
Deputy City Attorney and City Prosecutor

Cc: Craig Leen, City Attorney
William Ortiz, Code Enforcement Director
Maria Rosa Higgins-Fallon, Public Affairs Manager

EXHIBIT A

Protect Coral Gables
Sponsored



KEEP CORAL GABLES SAFE

Call your elected officials and tell them to step up to the plate and protect our families.

CALL 305-460-5323

Comm. Frank Quesada, Comm. Michael Mena
Comm. Patricia Keon, Comm. Vince Lago
Mayor Valdes-Fauli



59 views

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ON SECURITY GUARDS IN CORAL



59 views

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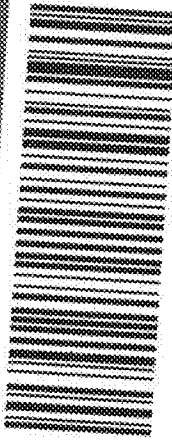
Call your elected officials and tell them to step up to the plate and protect our families. Demand they hire Certified Police Officers!

CALL 305-460-5323

Comm. Frank Quesada, Comm.
Michael Mena, Comm. Patricia
Keon, Comm. Vince Lago, Mayor
Valdes-Fauli

THE CITY OF CORAL GABLES
OFFICE OF THE CITY ATTORNEY
P.O. BOX 141549
CORAL GABLES, FLORIDA 33114-1549

PERMISSIONED MAIL



7015 3010 0001 0620 2635

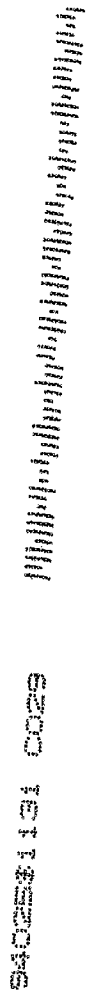
Instagram
Corporate Headquarters
General Counsel/Legal Department
200 Jefferson Drive
Menlo Park, CA 34025

POSTAGE \$ 006.77

FB

PICK-UP

060617-1



Gamez, Annie (MIA - X27467)

From: Ramos, Miriam <mramos@coralgables.com>
Sent: Thursday, June 15, 2017 11:25 AM
To: Gamez, Annie (MIA - X27467); Suarez, Cristina
Subject: FW: Intellectual Property Notification Complaint #130307874199961

Miriam Soler Ramos, Esq.

Deputy City Attorney & City Prosecutor

City of Coral Gables

405 Biltmore Way, 3rd Floor

Coral Gables, FL 33134

(305) 460-5218

(305) 460-5084 direct dial

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Confidentiality: The information contained in this transmission may be legally privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited.

-----Original Message-----

From: No Reply [mailto:notification@mail.instagram.com]

Sent: Saturday, May 27, 2017 5:08 PM

To: Ramos, Miriam

Subject: Intellectual Property Notification Complaint #130307874199961

Hi,

Thanks for contacting Instagram. We're reaching out regarding your recent report. It appears that the content at issue has already been removed from Instagram, which we understand this to resolve this report.

This is a no-reply email. If you'd like to report something else, or if you don't believe this action resolved your issue, please fill out this form:

https://urldefense.proofpoint.com/v2/url?u=http-3A__help.instagram.com_contact_372592039493026&d=DwIGaQ&c=14jPbF-1hWnYXveJ5rixtS_Fo3DRrpL7HUwJDac4Hlc&r=ffJFNW4cT0sfp6rmCLzsnGmK1MkkL8-ReFKpgb09NC8&m=voCUA3ZqmLJ19ujlztlf6bwsjHt16AMoaYoRtGhcjA&s=1RKylGUzfo3DkFKt6fU90g5F3JS7UHPoASFUdpL-Rwl&e=

Please reference this report (Complaint #130307874199961) in your new report if you think it will help us better understand your issue.

If you have any additional questions, please visit the Intellectual Property section of our Help Center:

https://urldefense.proofpoint.com/v2/url?u=http-3A__help.instagram.com_535503073130320&d=DwIGaQ&c=14jPbF-1hWnYXveJ5rixtS_Fo3DRrpL7HUwJDac4Hlc&r=ffJFNW4cT0sfp6rmCLzsnGmK1MkkL8-ReFKpgb09NC8&m=voCUA3ZqmLJ19ujlztlf6bwsjHt16AMoaYoRtGhcjA&s=HGc5P5K0wbdJf2z7iJnwivHKEoOT-kmj8ydjbM5x1FE&e=

Thanks,

The Instagram Team

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

Gamez, Annie (MIA - X27467)

From: Ramos, Miriam <mramos@coralgables.com>
Sent: Thursday, June 15, 2017 11:22 AM
To: The Instagram Team
Cc: Leen, Craig; Suarez, Cristina; Gamez, Annie (MIA - X27467)
Subject: RE: City of Coral Gables TDR

On behalf of the City of Coral Gables, the cease and desist letter remains in effect and if another ad is published using our trademark, Instagram will be fined \$500 per day.

Please provide this email to your general counsel and ask them to respond to us.

Miriam Soler Ramos, Esq.
Deputy City Attorney & City Prosecutor
City of Coral Gables
405 Biltmore Way, 3rd Floor
Coral Gables, FL 33134
(305) 460-5218
(305) 460-5084 direct dial

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Confidentiality: The information contained in this transmission may be legally privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited.

-----Original Message-----

From: ig-t2+jrrrjfe.aea4glu47pm4g@support.instagram.com [mailto:ig-t2+jrrrjfe.aea4glu47pm4g@support.instagram.com]
Sent: Wednesday, June 14, 2017 5:29 PM
To: Ramos, Miriam
Subject: Re: City of Coral Gables TDR

Hi,

Thanks for your report. Based on the information you’ve provided, it is not clear that the content you’ve reported infringes your trademark rights. The reported party appears to be using your trademark to refer to or comment on your goods and services.

For this reason, it does not appear that the reported content is likely to confuse people as to source, sponsorship or affiliation, and we are unable to act on your report at this time.

Thanks,

Liam
Intellectual Property Operations
Instagram

-----Original Message-----

From: Miriam Ramos (cleen@coralgables.com)
Subject: City of Coral Gables TDR

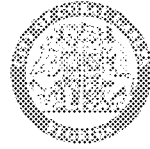
Please see attached

-----End Original Message-----

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

EXHIBIT F

THE CITY OF CORAL GABLES



The City Beautiful

OFFICE OF
THE CITY ATTORNEY

CITY HALL 405 BILTMORE WAY
CORAL GABLES, FLORIDA 33134

May 26, 2017

Facebook
Corporate Headquarters
General Counsel/Legal Department
1 Hacker Way
Menlo Park, CA 94025

RE: "Protect Coral Gables" Facebook page

Facebook General Counsel,

It has come to the attention of the City of Coral Gables that a Facebook page under the name "Protect Coral Gables" has been opened (see attached as Exhibit A). The page can be found at: https://www.facebook.com/Protect-Coral-Gables-300554647023527/?mt_nav=0 The emblem used as the profile picture for the Facebook page is a trademark owned by the City of Coral Gables and registered in the United States (Registration No. 4,307,912).

We, therefore, order that your company immediately cease and desist from allowing the use of our protected logo on the "Protect Coral Gables" Facebook page. Pursuant to Coral Gables Ordinance 2016-059, failure to comply with this letter will subject Facebook to a code enforcement citation carrying a fine of \$500 per day of violation.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Ramos".

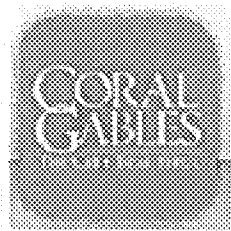
Miriam S. Ramos
Deputy City Attorney and City Prosecutor

Cc: Craig Leen, City Attorney
William Ortiz, Code Enforcement Director
Maria Rosa Higgins-Fallon, Public Affairs Manager
Janet Moreira, Special Counsel

EXHIBIT A


Email or Phone Password

[Forgot account?](#)



[Like](#) [Share](#) [Suggest Edits](#)

[Send Message](#)




 **Protect Coral Gables** updated their profile picture
20 hrs



[Like](#) [Comment](#)


Community Services

Community

-  Invite your friends to like this Page
-  2 people like this
-  2 people follow this

About

[See All](#)

 Community Services

People

 2 likes

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

[Privacy](#) · [Terms](#) · [Advertising](#) · [Ad Choices](#)
[Cookies](#) · [More](#)
Facebook © 2017

Protect Coral Gables

- [Home](#)
- [Posts](#)
- [Photos](#)
- [About](#)
- [Likes](#)

[Create a Page](#)

See more of Protect Coral Gables by logging into Facebook

Message this Page, learn about upcoming events and more:

or

Gamez, Annie (MIA - X27467)

From: Ramos, Miriam <mramos@coralgables.com>
Sent: Thursday, June 15, 2017 11:24 AM
To: Gamez, Annie (MIA - X27467); Suarez, Cristina
Subject: FW: Intellectual Property Notification Complaint #302369113537857

Miriam Soler Ramos, Esq.

Deputy City Attorney & City Prosecutor

City of Coral Gables

405 Biltmore Way, 3rd Floor

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(305) 460-5084 direct dial

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-----Original Message-----

From: No Reply [mailto:noreply@facebook.com]

Sent: Friday, May 26, 2017 5:41 PM

To: Ramos, Miriam

Subject: Intellectual Property Notification Complaint #302369113537857

Hi,

Thanks for bringing this matter to our attention. We removed or disabled access to the content you reported for violating the Facebook Statement of Rights and Responsibilities. We understand this action to resolve your intellectual property issue.

This is a no-reply email that is sent from an address that cannot accept incoming email. Please do not reply to this message. Any replies will not be received.

If you'd like to report something else, or if you don't believe this action resolved your issue, please fill out this form:

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.facebook.com_help_contact_208282075858952&d=DwlGaQ&c=14jPbF-1hWnYXveJ5rixtS_Fo3DRpL7HUwJDac4Hlc&r=ffJFNW4cT0sfp6rmCLzsnGmK1MkkL8-ReFKpgb09NC8&m=74tUA41dg6F9sixp9hBmO3uqQZKBSvgAPV4Caxq3VI0&s=yQO-8iOoVSZ9hKV-2GOBfiXH2CjvDnwDZTNHaqctys8&e=

Please reference this report (Complaint #302369113537857) in your new report if you think it will help us better understand your issue.

If you have any additional questions, please visit the Intellectual Property section of our Help Center:

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.facebook.com_help_intellectual-5Fproperty&d=DwlGaQ&c=14jPbF-1hWnYXveJ5rixtS_Fo3DRpL7HUwJDac4Hlc&r=ffJFNW4cT0sfp6rmCLzsnGmK1MkkL8-ReFKpgb09NC8&m=74tUA41dg6F9sixp9hBmO3uqQZKBSvgAPV4Caxq3VI0&s=5ohJx9UB_FvH07J3HwPmv-o-Q5IAGQcWnCOq1OIBoiQ&e=

Thanks,

The Facebook Team

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