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CASE NUMBER: 17-2-27517-4 KNT

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

YUE TING JIA, an individual,

Plaintiff,

v.

YINGQIONG GU, an individual,

Defendant.

No. 17-2-27517-4 KNT

**PLAINTIFF YUE TING JIA’S MOTION
FOR TEMPORARY RESTRAINING
ORDER**

I. INTRODUCTION

Plaintiff Yue Ting (“YT”) Jia (hereinafter, “Plaintiff” or “Jia”) respectfully requests that the Court enter a temporary restraining order against Defendant Yingqiong Gu (“Defendant” or “Gu”): 1) requiring Defendant to immediately remove all posts on WeChat.com, and other internet sites to be identified, that contain false, defamatory statements concerning Plaintiff, 2) enjoining Defendant from publishing further defamatory statements concerning Plaintiff, and 3) enjoining Defendant from harassing, contacting, surveilling, or otherwise intruding upon Plaintiff’s privacy.

Plaintiff is a citizen of China and is the Chairman and founder of Faraday & Future, Inc. (“Faraday”), a privately owned Gardena, California company with nearly 1,000 employees in California, and several hundred million dollars invested, that is committed to developing and marketing electric automobiles. Faraday has positioned itself as competitor to Tesla in the electric car market. It has purchased a large premise in Las Vegas and leased

1 another facility in Hanford, California in order to employ hundreds of workers for mass
2 production of its electric cars.

3 Defendant has been publishing defamatory statements concerning Plaintiff on social
4 media platforms and to journalists, in an effort to harm Mr. Jia's reputation and sow distrust
5 among potential investors and employees of Faraday while Mr. Jia is in the process of
6 trying to raise capital to fund Faraday's continued growth. These defamatory statements
7 include claims that Plaintiff has engaged in money laundering, cheated investors as part of a
8 Ponzi scheme, attempted to evade Chinese authorities by relocating to the United States,
9 created shelters to protect assets from creditors, and raised money from Chinese-national
10 investors in a purported racist scheme to transfer wealth to non-Chinese individuals. The
11 publication of these false statements has harmed Mr. Jia's and Faraday's reputation at a
12 critical time for the company as it continues to raise capital needed to begin mass
13 production of its vehicles.

14 Defendant has also attempted to access, and has claimed to have procured,
15 privileged documents from Mr. Jia's California attorneys. Defendant has further followed
16 Mr. Jia while he goes about his daily activities, including investor meetings Mr. Jia attends
17 and the Los Angeles-area restaurants he has visited. Finally, Defendant has identified and
18 publicized sensitive personal information, including Mr. Jia's current address and photos of
19 his family.

20 Plaintiff, his companies and their employees stand to suffer irreparable harm if
21 Defendant is not enjoined from continuing this course of conduct.

22 Defendant has not only shown disregard for the well-being of Mr. Jia and Faraday's
23 employees, but has previously disregarded an order from another court enjoining his
24 harassing, harmful activities. In late September of this year, Mr. Jia obtained a temporary
25 restraining order from a California court due to Defendant's behavior. Nevertheless,

1 Defendant continued to publish defamatory statements in the face of that court order. The
2 California court declined to extend the order due to personal jurisdiction concerns, as
3 Defendant is a resident of Washington. This Court faces no such issues.

4 Accordingly, Mr. Jia seeks a TRO that provides the following relief:

- 5 (1) Requiring Defendant to immediately remove specifically-identified posts on
6 WeChat.com and/or other internet sites to be identified that contain
7 defamatory statements concerning Plaintiff.
8 (2) Enjoining Defendant from publishing further defamatory statements
9 concerning Mr. Jia.
10 (3) Enjoining Defendant from harassing, contacting, surveilling, or otherwise
11 intruding upon Plaintiff's privacy.

12 II. FACTS

13 A. Mr. Jia and Faraday

14 Mr. Jia is a Chinese citizen, and is the Chairman and founder of Faraday & Future,
15 Inc. ("Faraday"), a privately owned Gardena, California company with nearly 1,000
16 employees in California, and several hundred million dollars invested, that is committed to
17 developing and marketing electric automobiles. *See* Declaration of Yue Ting Jia in Support
18 of Motion for Temporary Restraining Order ("Jia Decl."), ¶ 2.¹

19 Over the past two years, Mr. Jia has been actively trying to raise capital for Faraday.
20 Faraday is currently in an important transition period in which it is attempting to bring an
21 electric automobile to market, and it requires new capital to accomplish that goal. Faraday's
22 product, FF91, has attracted a great deal of attention since its debut at the 2017 Consumer
23 Electronics Show in Las Vegas, and it purchased a large premises in Las Vegas and has

24
25 ¹ Mr. Jia is also the founder of Leshi Holdings (Beijing) Co., Ltd. ("LeECO"), a privately owned multinational company based in Beijing, China that develops and markets consumer electronic products and distributes entertainment over the Internet. *Id.*

1 leased another facility in Hanford, California in order to employ hundreds of workers for
2 mass production of its electric cars. *Id.*, ¶ 19. As is the case for many other start-ups as they
3 raise capital (think Elon Musk and Tesla or Mark Zuckerberg and Facebook), Mr. Jia’s
4 reputation and Faraday’s success are interconnected.

5 **B. Defendant’s Defamatory, Harassing Activities.**

6 Starting in July 2017, Defendant has repeatedly posted on WeChat.com (the most
7 popular social media platform in China and accessible in the world with nearly 900 million
8 active monthly users at the end of 2016, similar to WhatsApp and Facebook) claims that Mr.
9 Jia is trying to defraud creditors, investors, employees, and government authorities. *Id.*, ¶¶ 7,
10 11. These posts include false allegations that Mr. Jia (i) is attempting to flee China, his home
11 country where he has his permanent residence; and (ii) has engaged in a years-long scheme
12 to defraud Chinese investors to enrich non-Chinese executives and employees in the United
13 States. *Id.* ¶ 11. Defendant has further claimed that he has attempted to obtain, and has
14 obtained, privileged documents prepared by Mr. Jia’s California attorneys. *Id.* ¶ 9. Finally,
15 Defendant’s posts indicate that he has been following Mr. Jia in California as Mr. Jia goes
16 about his daily activities, and he has posted personal information about Mr. Jia, including the
17 address of the residence he uses while he is in the United States and photographs of his
18 family. *Id.* ¶ 4.

19 The following are only some of the examples of the false, defamatory, and harassing
20 statements published by Defendant:

- 21
- 22 • On July 22, 2017, Gu published a post on WeChat titled, “Why Do We Call Yueting
23 Jia A [Liar]?” In that post, Gu claimed that Mr. Jia kept “telling new stories” and
24 used “new [investors’] money in old debt” in a “Ponzi scheme.” Gu also compared
25 Mr. Jia to Bernie Madoff (the convicted investment manager) and Enron. He
concluded his post by observing that Madoff’s “personal property was confiscated by
the court for auctions - even his underwear” while Mr. Jia seems “to be living a
comfortable life in [my] luxury house in the US.” *Id.*, ¶ 12 and Exhibit 5.

- 1 • On August 25, 2017, Gu published another post titled, “Exclusive. Two Things
2 Yueting Jia is doing in the US.” Gu claimed to have “credible local sources” and
3 reviewed “relevant materials in LA” and stated that based on those sources he had
4 learned that Mr. Jia deliberately misled investors by sending out “false information”
5 about “negotiating for funding in Hong Kong” and been trying to “obtain [a] Green
6 Card as soon as possible.” The rest of Gu’s post consists of a derogatory and false
7 allegation that Mr. Jia had “no intention of going back to China” and had been trying
8 to establish an irrevocable trust to avoid paying “a tribute to Uncle Sam.” Gu also
9 wrote, “Dear creditors, have you figured out? Whether it’s in China or in the US
10 ‘Accountant Jia’ always gets his way.” *Id.*, ¶ 13 and Exhibit 6.
- 11 • On September 14, 2017, Gu wrote that Mr. Jia “can’t [] love” suppliers, employees,
12 or investors of LeECO, and had been trying to hide assets from creditors to avoid
13 paying them. *Id.*, ¶ 14 and Exhibit 3.
- 14 • On September 21, 2017, Gu published a post titled “Yueting Jia Uses ‘Innocent
15 Investors’ Money’ To Invest In Automobiles In US, Risks Becoming Empress
16 Dowager Ci Xi In The Eyes of the Caucasian People.” In this post, Gu claimed that
17 Mr. Jia “used the money [I] obtained” from “Innocent Investors and gave it to the
18 Caucasians, asking nothing in return.” Gu also claimed he interviewed a former
19 Faraday employee, and alleged that at Faraday Mr. Jia hired “Caucasian senior
20 executives” who only “need Chinese money” from “dumb Chinese” investors. The
21 post further asserted that at Faraday Mr. Jia sought to hire engineers from “third
22 world” countries like “China, India and Iran” and favored “Iranians and Indians” to
23 Chinese engineers. *Id.*, ¶ 15 and Exhibit 7.
- 24 • On September 29, 2017 Gu published yet another false article entitled “The US
25 Government Starts to Investigate Multibillionaire Hongbin Sun and Yueting Jia.” In
addition to falsely stating that Mr. Jia was under some sort of investigation, the article
falsely claimed that Mr. Jia was involved in a transaction that could cause investor
assets to “flow out of China into the US in order to repurchase back the assets and
stocks of the other company. Everything is reasonable and legal, and it is just that at
the end the innocent investors will pay for everything.” *Id.*, ¶ 16 and Exhibit 8.

Defendant’s harassing activities have not been limited to publishing false statements
about Mr. Jia. Defendant has gone further and obtained, or attempted to obtain, privileged
information from Mr. Jia’s attorneys, followed Mr. Jia while he goes about his daily
activities in California, and published personal information about Mr. Jia and his family. For
example:

- 1 • Defendant publicized the address and photographs of the residence Mr. Jia uses while
2 he is in the United States for business. Specifically, on July 15, 2017, Defendant
3 published a post titled, “A Tour Around Yueting Jia’s House In America,” in which
4 Defendant disclosed property records for a residence in which he claimed Mr. Jia
5 lives. In that same post, Defendant also claimed Mr. Jia “had Shanghai cuisine on
6 July 12 evening” in Rancho Palos Verdes. Defendant implied that he was surveilling
7 Mr. Jia on July 12 at the restaurant; the post included the comment, “He looked good
8 at that time.” Defendant concluded with the question, “He has lived in his own way,
9 and what about you?” *Id.* ¶¶ 7-8 and Exhibit 2.
- 10 • On September 14, 2017, Defendant wrote in a post titled, “Who Does Yueting Jia
11 Love Exactly?” that he had obtained, from an undisclosed source who worked at a
12 law firm that Mr. Jia had retained, copies of an irrevocable trust created for the
13 benefit of Mr. Jia’s two daughters. In this post, Defendant included a copy of the
14 irrevocable trust that purports to be signed by Mr. Jia and transfers funds “from
15 Farad[ay] Company’s capital pool” to his children. The document is a forgery and
16 Defendant has falsely claimed to have access to a confidential source in a Los
17 Angeles law firm Mr. Jia has retained. *Id.*, ¶ 9 and Exhibit 3.
- 18 • After Defendant posted a copy of the forged, purported irrevocable trust, a journalist
19 from sina.com, an influential Chinese website, contacted Defendant and interviewed
20 him regarding, among other things, his sources of information about Mr. Jia. The
21 sina.com article, titled “Living Trust Whistle-Blower: No Personal Enmity Between
22 Yueting Jia And I And No Fear Of Being Sued,” was published on September 15. It
23 repeated Defendant’s claims that Mr. Jia had “hired a couple of law firms in Los
24 Angeles and had them draft” the above-mentioned, forged irrevocable trust. *Id.* ¶ 10
25 and Exhibit 4.

C. The Effects of Gu’s Harassing Conduct and Allegations

Defendant’s WeChat posts have been re-circulated on other social media platforms and by major media outlets, and have negatively impacted Mr. Jia and his family. Mr. Jia, his wife, and various Faraday employees have received queries from friends, suppliers, potential investors, and acquaintances about whether Defendant’s allegations are true. *Id.*, ¶ 17.

Defendant’s posts have also caused Mr. Jia and his family (including his wife and daughters) substantial emotional distress. *Id.*, ¶ 18. Mr. Jia has spent his entire career building companies that employ thousands around the world; the suggestion that he is running a Ponzi scheme to defraud investors and engaging in a racist attempt to divert funds

1 from Chinese investors to non-Chinese executives is personally offensive and harassing, and
2 impairs Mr. Jia's ability to conduct business and build relationships with employees,
3 investors, and others. *Id.* Indeed, as Chairman and founder of Faraday, Mr. Jia's personal
4 reputation is closely connected to the company's ability to raise capital. *Id.*, ¶ 19. Without
5 sufficient capital, Faraday, and its nearly 1,000 California-based employees, face serious
6 risks. *Id.*

7 Defendant's activities also invade Mr. Jia's privacy. Defendant has attempted to
8 obtain information protected by the attorney-client privilege, has posted information about
9 Mr. Jia's address, and has followed Mr. Jia while he conducts daily activities in California.
10 Defendant's actions have cause Mr. Jia concern that he, or someone who reads and believes
11 his false allegations, could try to locate him and his family and threaten their safety. *Id.*, ¶
12 20.

13 **D. Defendant's Continued Harassment Despite Efforts To Convince Him To Cease.**

14 Compounding the seriousness of Defendant's activities is the fact that he appears
15 determined to continue them, even in the face of court orders. Mr. Jia has previously tried to
16 contact Defendant through counsel he retained in China to ask that Defendant refrain from
17 his harassing conduct and postings, but Defendant has refused to stop. *Id.*, ¶ 21. Mr. Jia
18 initiated litigation against Defendant in California and actually obtained a temporary
19 restraining order against him, but again Defendant refused to stop. *Id.* On October 2, two
20 days after the California court issued the temporary restraining order, Defendant published a
21 post on WeChat in which he referred to Mr. Jia as "Accountant Jia" and claimed—falsely—
22 that Mr. Jia was spending funds owed to "innocent investors and [] suppliers" on "paid
23 commentators" to attack Defendant. *Id.*, Exhibit 9. Defendant repeated the false accusations
24 the California court had restrained, including that Mr. Jia was trying to get a "green card" on
25 a "fast turnaround," was fleeing to the US, and trying to cheat "innocent investors in China."

1 *Id.* The California court thereafter declined to extend the temporary restraining orders due to
2 personal jurisdiction concerns, as Gu is not a resident of California. As a result, Mr. Jia, his
3 family, and Faraday are currently without any protection from Gu’s stream of false
4 statements. *Id.*, ¶ 22.

5 Defendant’s endgame appears to be a desire to extract a monetary payment from Mr.
6 Jia to cease his harassing activities. In a WeChat post addressing a request by another
7 Chinese businessman to remove false and harassing posts about him, Gu claimed he
8 demanded 1.26 million Chinese RMB (approximately \$190,000) to remove his posts. *Id.*,
9 Exhibit 10. In short, unless this Court acts to protect Mr. Jia, or Mr. Jia pays Defendant an
10 exorbitant sum of money, it is clear that Defendant will continue with his harassing and
11 defamatory activities.

12 III. ARGUMENT

13 A. Legal Standard

14 To obtain injunctive relief, a party must show “(1) that he has a clear legal or equitable
15 right, (2) that he has a well-grounded fear of immediate invasion of that right, and (3) that the
16 acts complained of are either resulting in or will result in actual and substantial injury to him.”
17 *Tyler Pipe Indus., Inc. v. Dep’t of Revenue*, 96 Wn.2d 785, 792, 638 P.2d 1213 (1982); *see also*
18 RCW 7.40.020. The granting or withholding of an injunction “is addressed to the sound
19 discretion of the trial court to be exercised according to the circumstances of each case.”
20 *Washington Fed’n of State Employees, Council 28, AFL-CIO v. State*, 99 Wn.2d 878, 887, 665
21 P.2d 1337 (1983).

22 B. Mr. Jia Has A Clear Legal or Equitable Right.

23 To determine whether a party has a clear legal or equitable right, a court must
24 “examine the likelihood of that party ultimately prevailing on the merits.” *Tyler Pipe*, 96
25 Wn.2d at 793. In making that determination, however, the court does not adjudicate the

1 ultimate rights in the lawsuit. *Id.* Here, Mr. Jia is likely to succeed on the merits of his
2 claims for defamation, invasion of privacy, and intentional infliction of emotion distress
3 against Defendant.

4 The tort of defamation “vindicates a citizen’s interest in his or her good reputation.”
5 16A Wash. Prac., Tort Law and Practice § 20:1 (4th ed.). A defamation plaintiff must show
6 four essential elements: falsity, an unprivileged communication, fault, and damages. *Mark*
7 *v. Seattle Times*, 96 Wn.2d 473, 486, 635 P.2d 1081, 1088 (1981).

8 The falsity of numerous statements posted to WeChat and circulated in the media by
9 Defendant is discussed above. Among other things, Defendant has falsely claimed on
10 WeChat posts that Mr. Jia has engaged in money laundering, cheated investors as part of a
11 Ponzi scheme, attempted to evade Chinese authorities by relocating to the United States,
12 created shelters to protect assets from creditors, and raised money from Chinese-national
13 investors in a purported racist scheme to transfer wealth to non-Chinese individuals. These
14 false allegations constitute defamation *per se*. See *Maison de France, Ltd. v. Mais Oui!,*
15 *Inc.*, 126 Wash. App. 34, 44–45 (2005) (“A defamatory publication is libelous *per se* . . . if
16 it (1) exposes a living person to hatred, contempt, ridicule or obloquy, to deprive him of the
17 benefit of public confidence or social intercourse, or (2) injures him in his business, trade,
18 profession or office.”). Defendant’s false statements are not privileged, and have caused
19 actual harm to Mr. Jia’s reputation and hindered his ability to raise funds for Faraday during
20 a critical time for that company as it attempts to bring its vehicles to the market.²

21 ² Mr. Jia is not a public figure, so is not required to show actual malice. See *Valdez-Zontek v.*
22 *Eastmont Sch. Dist.*, 154 Wash. App. 147, 159 (2010) (“To be considered a public figure, courts
23 usually require the plaintiff to voluntarily seek to influence the resolution of public issues.”). But even
24 if he were a public figure, Defendant has clearly acted with malice. “A defendant acts with malice
25 when he knows the statement is false or recklessly disregards its probable falsity.” *Duc Tan v. Le*, 177
Wash. 2d 649, 669 (2013). Defendant’s allegations are entirely baseless, and his actions have already
been enjoined once by a court. The fact that Defendant has continued to publish false allegations in
the face of that court order at the very least indicates that he has acted with reckless disregard.
Moreover, the fact that Defendant is apparently engaged in a scheme to extract a monetary payment
from Mr. Jia further provides evidence of malice.

1 Defendant's activities have also invaded Mr. Jia's right to privacy, as they are an
2 intrusion on Mr. Jia's seclusion and have placed Mr. Jia in a false light.

3 To succeed on a claim for invasion of privacy through intrusion on seclusion, Mr.
4 Jia must show the Defendant "(1) deliberately intruded; (2) into the plaintiff's solitude,
5 seclusion, or private affairs; (3) in a manner that would be highly offensive to a reasonable
6 person." *Armijo v. Yakima HMA, LLC*, 2012 WL 2576624, at *2 (E.D. Wash. July 3, 2012).
7 Defendant has clearly done so, in numerous ways. He has attempted to gain, and claims to
8 have gained, documents and information protected by the attorney-client privilege, "perhaps
9 the most sacred of all legally recognized privileges." *United States v. Bauer*, 132 F.3d 504,
10 510 (9th Cir. 1997). He has further located and published the address that Mr. Jia uses
11 when he is in the United States for business. These deliberate intrusions are highly
12 offensive to any reasonable person.

13 Defendant's false statements on WeChat and elsewhere have further placed Mr. Jia
14 in a false light for the same reasons that they constitute defamation, plus the fact that they
15 have cause Mr. Jia and his family mental distress. See *Eastwood v. Cascade Broad. Co.*,
16 106 Wash. 2d 466, 471 (1986) ("The theoretical difference between [defamation and
17 invasion of privacy by placing plaintiff in a false light] is that a defamation action is
18 primarily concerned with compensating the injured party for damage to reputation, while an
19 invasion of privacy action is primarily concerned with compensating for injured feelings or
20 mental suffering. The two torts overlap, however, when the statement complained of is both
21 false and defamatory. In such a case the plaintiff can proceed upon either theory.").

22 In short, Mr. Jia is likely to succeed on the merits of his claims, and thus has
23 demonstrated a clear legal and equitable right to relief.

1 **C. Mr. Jia Has a Well-Founded Fear of Immediate Invasion of His Rights.**

2 Mr. Jia’s rights have already been invaded, and damage is continuing as long as the
3 defamatory posts remain available online and Defendant continues to publish additional
4 false posts on WeChat. Mr. Jia’s well-grounded fear is also evidenced by the fact that
5 Defendant did not refrain from his activities even when subject to a California court order,
6 and the fact that Defendant has boasted about previously engaging in a similar campaign
7 against another Chinese businessman in exchange for a monetary payoff.

8 **D. Mr. Jia will Suffer Actual and Substantial Injury if Defendant Is Not Enjoined.**

9 A publication is defamatory *per se* (actionable without proof of special damages) if
10 it “(1) exposes a living person to hatred, contempt, ridicule or obloquy, or to deprive him of
11 the benefit of public confidence or social intercourse, or (2) injures him in his business,
12 trade, profession or office.” *Life Designs Ranch, Inc. v. Sommer*, 191 Wn. App. 320, 328,
13 364 P.3d 129 (2015), *review denied*, 185 Wn.2d 1022 (2016). Such is the case with respect
14 to the claims of Mr. Jia.

15 But even if Defendant’s statements were not defamatory *per se*, they have still
16 caused Mr. Jia actual and substantial harm. As explained above, injury to Mr. Jia’s
17 reputation caused by Defendant’s publications and the associated questions raised in the
18 minds of actual or potential investors who read or hear about Defendant’s false allegations
19 has harmed Mr. Jia’s and Faraday’s ability to raise capital in a critical time for the company.
20 If Defendant is not enjoined from his harassing behavior, lasting damage could result to
21 Faraday and its 1,000 employees.

22 Defendant’s actions in surveilling Mr. Jia, claiming to have accessed privileged
23 information, and posting personal information about Mr. Jia, have also caused Mr. Jia and
24 his family mental and emotional distress. Defendant’s false claims that Mr. Jia has
25 committed a variety of crimes and torts has amplified his mental and emotional distress. In

1 short, Defendant’s actions have caused, and continue to cause, Mr. Jia actual and substantial
2 injury.

3 **IV. CONCLUSION**

4 For all the foregoing reasons, Plaintiff respectfully requests entry of a Temporary
5 Restraining Order, with immediate effect.

6
7 DATED this 23rd day of October, 2017.

8 CORR CRONIN MICHELSON
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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

YUE TING JIA, an individual,

 Plaintiff,

 v.

YINGQIONG GU, an individual,

 Defendant.

No. 17-2-27517-4 KNT

**ORDER GRANTING PLAINTIFF YUE
TING JIA’S MOTION FOR
TEMPORARY RESTRAINING ORDER
[PROPOSED]**

WHEREAS, Plaintiff Yue Ting Jia (“Plaintiff”) filed a Motion for Temporary Restraining Order (“Motion”) against Defendant Yingqiong Gu (“Defendant”); and

WHEREAS, the Court considered Plaintiff’s Motion and the evidentiary materials filed therewith, [and Defendant’s opposition], and having heard argument on October 23, 2017, the Court finds that a temporary restraining order is warranted to prevent ongoing harm to Plaintiff until such time as a preliminary injunction is heard in this matter. The Court finds that Plaintiffs’ Motion is well taken and the Motion is GRANTED, as set forth below.

IT IS HEREBY ORDERED that:

- A. Defendant, including his agents, employees, or representatives or anyone acting on their behalf, are required to immediately remove the posts on WeChat.com that contain defamatory statements concerning Plaintiff and/or reveal private information concerning Plaintiff and his family, and which are attached hereto as Exhibits 1 to 9, within twenty-four

1 (24) hours of the issuance of this Order.

2 B. Defendant, including his agents, employees or representatives or anyone acting
3 on their behalf, are required to immediately remove any additional posts made by Defendant
4 on TouTiao or any other internet location or website that contain defamatory statements
5 concerning Plaintiff and/or reveal private information concerning Plaintiff and his family.

6 C. Defendant, including his agents, employees or representatives or anyone acting
7 on their behalf, are further enjoined from publishing or causing to be published any posts or
8 commentary concerning Plaintiff or his family on WeChat.com, TouTiao.com or any other
9 internet location or website.

10 D. Defendant is enjoined from harassing, contacting, surveilling, or otherwise
11 intruding on Plaintiff's privacy. Defendant is enjoined from contact with or attempting to
12 contact employees or former employees of Plaintiff's law firms, employees or former
13 employees of Faraday & Future, Inc., and employees or former employees Leshi Holdings
14 (Beijing) Co., Ltd. Defendant is further enjoined from obtaining or attempting to obtain private,
15 privileged or confidential information concerning Plaintiff and his family.

16 This Order shall remain in effect until ruling is entered on Plaintiff's motion for
17 preliminary injunction, which is noted for hearing on _____
18 _____.

19 IT IS SO ORDERED this ____ day of October, 2017.

20
21
22 _____
23 Superior Court Judge/Commissioner
24
25

Presented By:

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ORDER GRANTING PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER – 3

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