

RETURN DATE: JULY 31, 2007

CARYL SCHIFF-GREATOREX, STEPHEN GREATOREX, and LINDA CUNNINGHAM,	:	SUPERIOR COURT
	:	
Petitioners,	:	JUDICIAL DISTRICT OF HARTFORD
	:	
v.	:	AT HARTFORD
	:	
	:	
GOOGLE, INC.,	:	
	:	
Respondent.	:	JULY 13, 2007

BILL OF DISCOVERY

Petitioners, for their Bill of Discovery, allege as follows:

1. Petitioner Caryl Schiff-Greatorex is an individual who resides in Berlin, CT. At all times relevant hereto, she has been employed as the Director of Member Services for the Connecticut State University American Association of University Professors (“CSU-AAUP”).
2. Petitioner Stephen Greatorex is an individual who resides in Berlin, CT. At all times relevant hereto, he has been employed as the Business Manager for the CSU-AAUP.

3. Petitioner Linda Cunningham is an individual residing in Suffield, CT. At all times relevant hereto, she has been employed as the Member Services Coordinator for the CSU-AAUP.
4. The aforementioned petitioners are about to commence an action for libel and false light invasion of privacy against individuals who, using pseudonyms, have posted false and defamatory statements on an internet blog site identified as “The SCSU Adjuncts Corner,” located at <http://thescsuadjunctscorner.blogspot.com> [hereinafter the “SCSU Blog.”] The petitioners bring this petition to discover the true identity and address of the potential defendant(s) to that action.
5. Respondent Google, Inc. (“Google”) is a corporation with a principal place of business at 1600 Amphitheatre Parkway, Mountain View, CA 94043. Google owns and operates the website known as “Blogger” (www.blogger.com), which hosts the SCSU Blog. Google is subject to jurisdiction in the State of Connecticut by virtue of its continuous solicitation of business from, and provision of content directed to, Connecticut residents, as well as its nationwide presence on the Internet.

6. On several dates between April 26, 2007 and the present, an unknown individual or individuals posted statements on the SCSU Blog about the petitioners, which statements are false and defamatory and/or portray the petitioners in a false light.
7. Specifically, on April 26, 2007 an individual using the pseudonym “David C.” posted the following statement in response to pay increases the petitioners recently received: “My first thought when I see those salary numbers is ‘*Someone is giving oral sex to someone else.*’ But then I have a smutty mind. Regardless of the salacious interpretations, *the whole thing reeks of corruption.*” (Emphasis supplied.)
8. Further, on April 27, 2007, an unidentified individual posted the following comment: “L. Cunningham apparently worked as secretary for some YMCA up there in Enfield (where she lives) or Suffield and as legend has it, *was fired*. Caryl Grotorex sat on that board and when Linda went crying to Caryl (as she often does), Caryl hired her as part of union staff. Now Caryl owns her; Caryl tells her to jump and she says, “how high?” [Also, upon information and belief, L.C. was also *fired* from her job somewhere out in the mid west before coming to CT.].

Apparently when she attends the meetings of National AAUp in D.C., she skips out

of the meetings and visits a cousin in Virginia! *It is blatantly illegal to use union dues for personal purposes.*" (Emphasis supplied.)

9. Further, on April 27, an unidentified individual posted the following comment concerning Caryl and Steven Greatorex: "You would think that with the course privileges that the staff are getting, they would have taken the time to enhance their educational qualifications. How about Steve Greatorex taking an accounting course or two. Biology? What do you have in that lab, petrie dishes? *Or are you too busy "cooking" the books.*" (Emphasis supplied.)
10. The aforementioned statements describe the petitioners as engaging in corrupt and illegal activities, as trading sexual favors for salary raises, as incompetent in the performance of their respective job responsibilities, and as having been terminated from past jobs for performance reasons. These statements are false and defamatory *per se* and also constitute an invasion of privacy in that they portray the petitioners in a false light.
11. For the foregoing reasons, the petitioners have probable cause to bring one or more causes of action for defamation and invasion of privacy against the unknown individual(s) who posted the above-referenced comments on the SCSU Blog, but

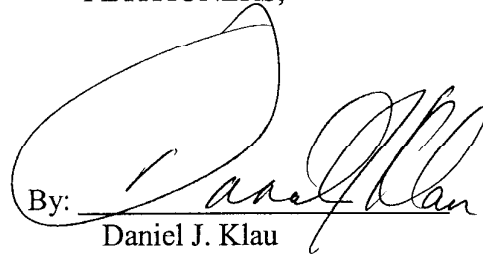
petitioners cannot commence that action without knowledge of said individual(s) true identity and address .

WHEREFORE, Petitioners pray that this Court order:

(1) The disclosure by respondent Google of any and all information in its possession, custody or control relating to the identity of the individual or individuals who posted the above-referenced false and defamatory comments, including without limitation, such individual's(s) name(s), home and/or business addresses(s), e-mail addresses, and telephone numbers;

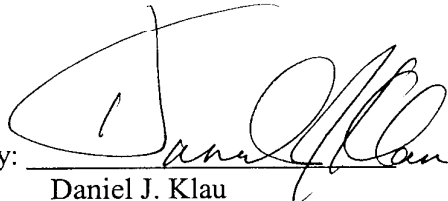
(2) Such other and further relief as the Court may deem just and proper.

PETITIONERS,

By: 

Daniel J. Klau
Pepe & Hazard, LLP
Goodwin Square
225 Asylum Street
Hartford, CT 06103-4302
Tel. (860) 522-5175
Fax. (860) 522-2796
Juris No. 101812

PETITIONERS

By: 

Daniel J. Klau
Pepe & Hazard, LLP
Goodwin Square
225 Asylum Street
Hartford, CT 06103-4302
Tel. (860) 522-5175
Fax. (860) 522-2796
Juris No. 101812