

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

<p>GOVERNMENT COMMUNICATIONS OFFICE FOR STATE OF QATAR,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">-against-</p> <p>JOHN DOES 1-10,</p> <p style="text-align: center;">Defendants.</p>
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Index No.

SUMMONS

Date Purchased:

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service (or within 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.

Plaintiff Government Communications Office for the State of Qatar designates Queens County as the place of trial. The basis of venue is CPLR § 503(a), which is proper because, upon information and belief, a substantial part of the events or omissions giving rise to the claim occurred in this county.

Dated: New York, NY
April 11, 2018

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

GOVERNMENT COMMUNICATIONS
OFFICE FOR STATE OF QATAR,

Plaintiff,

v.

JOHN DOES 1-10,

Defendants.

Index No. _____

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Government Communications Office for State of Qatar (“GCO” or “Plaintiff”) for its complaint against Defendants John Does 1-10 (“Defendants”), alleges and states as follows:

THE PARTIES

1. Plaintiff GCO is the communications arm of the State of Qatar, and operates in Qatar and in the United States, including in the State of New York.
2. Defendants John Does 1-10 are entities or individuals who, upon information and belief, reside in New York or are otherwise subject to the jurisdiction of this Court. The specific identities of the various Does are unknown to Plaintiff at this time, but Plaintiff is informed and believes, and thereon alleges, that each of the Does is responsible in some manner for the occurrences alleged in this Complaint, including anonymously posting false statements on various social media platforms and websites to interfere with business relationships, and that the Defendants each were the agents, joint venturers, alter egos, partners, representatives, and employees of each other, acting within the course and scope of said agency and employment of each of the other defendants, participated with, conspired with and aided and abetted each of the other defendants, and in doing the things herein alleged, were acting within the scope of such partnership, agency, representation or employment with the knowledge, authorization, consent and

ratification of the other defendants. Plaintiff will seek leave to amend this Complaint to insert the true names and capacities of each Doe when the same are ascertained.

JURISDICTION AND VENUE

3. This Court has jurisdiction over Defendants pursuant to New York Civil Practice Law and Rules (“CPLR”) § 302 because, upon information and belief, Defendants committed a tortious action within the state and media market of the state, and regularly do or solicit business, or engage in any other persistent course of conduct, or derive substantial revenue from goods used or consumed or services rendered, in this state. This Court also has jurisdiction pursuant to CPLR § 1024 because Plaintiff is “ignorant, in whole or in part, of the name or identify of a person who may properly be made a party.”

4. Venue in this Court is proper pursuant to CPLR § 503(a) because, upon information and belief, a substantial part of the events or omissions giving rise to the claim occurred in this county.

FACTUAL BACKGROUND

5. Plaintiff was established as an arm of the State of Qatar as a communications office. The GCO is the unified voice of Qatari businesses, specifically including Qatari businesses interested in international expansion, partnerships and global visibility.

6. This action is brought because Defendants have anonymously interfered with and subverted the existing and expected business relationships mentioned above. By doing so, Defendants, while hiding behind their anonymity, have caused irreparable harm and injury to Plaintiff’s operations and reputation. Defendants have done so through concerted negative, harmful and damaging efforts directed at Plaintiff through various social media and internet-based channels.

7. Starting at least as early as May of 2017, unknown individuals and entities who are identified as the Doe Defendants operated social media and internet accounts under the user name QatariLeaks, using Facebook, Twitter, Instagram, YouTube, and a website (<https://www.qatarileaks.com>), each of which posted false statements about the government of Qatar, including allegations that Qatar supports corruption and ignites strife.

8. Upon information and belief, Defendants' anti-Qatar social media campaign is intended to hurt Qatar's businesses.

9. Defendants' social media posts and attacks do not constitute opinion or protected political speech in its substance, content and purpose; instead, they are based on and consist of knowingly false statements and information.

FIRST CAUSE OF ACTION
(Tortious Interference with Prospective Economic Advantage)

10. Plaintiff realleges the allegations set forth in the preceding paragraphs as if fully set forth herein.

11. Plaintiff, as the communication arm of the State of Qatar, represents the unified voice for domestic and international Qatari businesses who possess business relations and prospective economic advantages affected by Defendants' conduct.

12. Upon information and belief, Defendants were aware of these prospective business and economic relationships with third parties.

13. Defendants have interfered with and disrupted these business relationships through their consistent and concerted efforts to confuse and misinform the public about Qatar and Qatari business relations and opportunity, thereby creating uncertainty as to Plaintiff's work communicating regarding Qatari business.

14. Defendants acted solely with malice or intent to inflict injury by unlawful means, rather than as a result of self-interest or other economic considerations. Defendants' conduct was unjustified and not fair or reasonable under the circumstances.

15. Upon information and belief, as a result of Defendants' wrongful conduct, certain of these prospective business relationships have been terminated, reduced or otherwise detrimentally modified.

16. As a direct and proximate cause of Defendants' intentional interference, Plaintiff has suffered damages in an amount to be proven at trial.

[Remainder of page intentionally left blank.]

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

Entry by this Court of a judgment against Defendants, awarding Plaintiff (a) damages in an amount to be proven a trial, (b) all reasonable attorneys' fees, costs, and expenses incurred in prosecuting this action, and (c) pre-judgment and post-judgment interest, as provided by law, and such other relief as the Court may deem just and proper.

Dated: New York, New York
April 11, 2018

Respectfully Submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

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