

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

DANIEL NEIDITCH, SABRINA MEHMEDOVIC,
and ESTATE OF ROBERT E. MORICONE, JR.,

Plaintiffs,

- against -

CAGLAR ACAR, LAURA QOKU, ADRIAN ZAINI,
BLERTA BEHLULI, SEBASTIAN CHRISTOPHER,
NING.COM, GODADDY.COM, WORDPRESS.COM,
TWITTER, INC., JOHN DOES 1 through 10, and
JANE DOES 1 through 10,

Defendants.

Index No. _____/2009

09110783

COMPLAINT

PLAINTIFFS DANIEL NEIDITCH, SABRINA MEHMEDOVIC and ESTATE OF
ROBERT E. MORICONE, JR. ,by and through their undersigned counsel Nesenoff & Miltenberg
LLP, as and for their Complaint, respectfully allege as follows:

1. This is an action alleging libel *per se*, brought to redress the serious injury to the reputations of Plaintiff Daniel Neiditch (a condo building President), Sabrina Mehmedovic (the condo building's Property Manager) and the Estate of Robert E. Moricone (the estate of the former condo Resident Manager) from a campaign of false and defamatory statements published recklessly and maliciously making, as a factual matter on websites set up purportedly for information, accusations of the serious crimes of murder, bribery, extortion, illicit payoffs and corruption.

THE PARTIES

2. Plaintiff Daniel Neiditch is an individual who is the President of River 2 River Realty Inc. and the President of the Board for the Atelier Condos Building and who maintains an office at the Atelier Condos Building located at 635 West 42nd Street, New York, New York 10036 .

3. Plaintiff Sabrina Mehmedovic is an individual who is the Property Manager at the Atelier Condos Building at 635 West 42nd Street, New York, New York 10036 and who maintains an office at that address.

4. Plaintiff Estate of Robert E. Moricone, Jr. is being administered by his mother, Catherine Saliani, who resides on Long Island, New York.

5. Defendant Caglar Acar is an individual who resides at 635 West 42nd Street, New York, New York 10036.

6. Defendant Laura Qoku is an individual who formerly worked at the building located at 635 West 42nd Street, New York, New York and resides at 153 Titus Avenue, Staten Island 10306.

7. Defendant Adrian Zaini is an individual who resides at 635 West 42nd Street, New York, New York 10036.

8. Defendant Blerta Behluli is an individual who formerly worked at the building located at 635 West 42nd Street, New York, New York 10036 and resides at 3155 Roshambeau Avenue, Bronx, New York 10467.

9. Defendant Sebastian Christopher is an individual who formerly worked at the building located at 635 West 42nd Street, New York, New York 10036 and resides at 21 Daerdegat Street, Brooklyn, New York 11236.

10. Defendant Ning.com is a company that is an online service provider with a principal office located at 735 Emerson Street, Palo Alto, California 94301.

11. Defendant GoDaddy.com is a company that is an online service provider that is headquartered in Scottsdale, Arizona and had a legal office for the receipt of service at 14455 North Hayden Road, Suite 219, Scottsdale, Arizona 85260. The policy of Defendant GoDaddy.com is not

to allow masking sites; however, there were four such masking sites operating through GoDaddy.com: Danneiditch.com; Danielneiditch.com; Danielscottneiditch.com; and Ateliercondominium.com. These four masking sites forward the computer user to the site provided by Defendant Ning.com that have contained the defamatory communications complained of herein.

12. Defendant Wordpress.com is a company that is an online service provider with its headquarters located at 255 1st Street, Suite 202, San Francisco, California 94105.

13. Defendant Twitter, Inc. is a company that provides "twitter" services that has a headquarters office located at 539 Bryant Street, Suite 402, San Francisco, California 94107.

14. Defendants John Does 1 through 10 are unknown persons who are also legally responsible for the defamations complained of herein.

15. Defendants Jane Does 1 through 10 are unknown persons who are also legally responsible for the defamations complained of herein.

VENUE

16. Venue exists in Nassau County under New York CPLR 503(a) based on the residence of the individual defendants.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

17. The Atelier Condos Building at 635 West 42nd Street in New York City has been a desirable residence in Manhattan. The policy of the owners and management of the Building, reflected in the building rules, has been to be opposed to stays under 90 days, which still has been and is relatively lenient because in many buildings in Manhattan, the minimum lease term is for one year. In November 2008, it was decided by the Condo Board that no rental would be allowed under 90 days in order to safeguard the building's reputation and maintain standards in the building.

18. Plaintiff Daniel Neiditch, as the President of the Atelier Condos Building at 635 West 42nd Street in New York City, and Plaintiff Sabrina Mehmedovic, as Property Manager of the Atelier Condos Building, have diligently exercised their respective responsibilities in the operations of the 635 West 42nd Street building; and, in the course of doing so, they have cracked down and enforced the Condo Board's decision not to allow renters for less than 90 days in accordance with building rules. Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic also have cracked down and enforced the building rules against occupants engaging in business activities in the building. In these efforts, Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic had the full working cooperation of Robert E. Moricone, Jr., the Resident Manager of the Atelier Condos Building who had held that position many years. These efforts, however, made unhappy certain owners, such as Defendant Caglar Acar and Adrian Zaini, who were desirous of renting their condo apartments for less than 90 days and running businesses in the building. These efforts also made unhappy certain now former employees, such as Defendants Laura Qoku and Blerta Behluli, who were fired for neglecting their job duties.

19. In response to the salutary efforts of Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. to enforce building rules, a number of websites popped up that carried posts and comments by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10 who falsely, and without basis, accused Plaintiff Dan Neiditch and Plaintiff Sabrina Mehmedovic of criminal activity, including murder, bribery, corruption and extortion and asserted that Robert E. Moricone, Jr. as having been a party to bribery, corruption and extortion. Such accusations constitute aggravated harassment in the second degree in violation of New York Penal Law § 240.30. The

websites were created through Defendants Ning.com and Wordpress.com; and "urls" operating as masking sites maintained by Defendant GoDaddy.com forwarded computer users to the aforesaid websites through Defendants Ning.com and Wordpress.com. In addition, the same comments were "twittered" via the service provided by Defendant Twitter, Inc. and further forwarded by e-mail to Atelier Condos Building residents by Defendant Caglar Aclar.

20. As stated above, the Resident Manager of the Atelier Building at 635 West 42nd Street for many years was one Robert E. Moricone, Jr.. On July 1, 2009, Robert E. Moricone, Jr. tragically committed suicide by self inflicted gunshot wound. Plaintiff Daniel Neiditch, as the Condo Board President, issued an announcement with "deepest regret" to Atelier Condos Building residents that Robert E. Moricone, Jr. had passed away at age 32, that our "heart and prayers go out to his family" and that he "will be truly missed always."

21. The response to this appropriate announcement included a post made, on information and belief, by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10 at atelierowners.wordpress.com by Defendant Wordpress.com under the headline "Atelier Building, . . . , site of Corruption Mess and One Man Dead So Far" that accused Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic of "corruption, bribery, extortion, payoffs, etc." The post went on to state:

"Involved, said to include: Atelier Board President, Dan Neiditch, down to Super, Robt. & mangr, Sabrina Mehmedovic. Leads to ONE DEAD!!!

"All the best & nicest Atelier Bldg employees are routinely instantly fired, only the worst and most complicit employees are retained.

"Atelier Board Pres. Dan Neiditch runs a corrupt operation. . . ."

The post falsely continued:

“Wow! This just in: There was a heated closed-door meeting between Sabrina, Dan & Robert.

“When they all came out, Robert looked so so terribly upset, no one had ever seen him that upset before.

“Robert kept mumbling, ‘I can’t take this any more.’ . . . Many assume Robert was asked to do more corrupt cover-up type things, lies, etc. . . .

“But, many say, these sort of lies, cover-ups, scams, tyranny are all the norm for the corruption with Atelier board pres. Dan Neiditch.”

After quoting Plaintiff Daniel Neiditch’s announcement of Robert Moricone’s death, the post stated:

“Is it laughable. . .? Or cryable? Many Atelier residents are asking themselves. . . .

“The two faced lies from Dan Neiditch (Pres., Atelier Condos) and his Nazi-like paid staff like Sabrina Mehmedovic, are just sickening.

“Many Atelier residents know what’s been going on for some time & are demanding Criminal Charges be levied against Dan Neiditch, . . . Sabrina Mehmedovic, and a few other conspirators.

“

“For the latest breaking news updates, follow us on Twitter at http://twitter.com/atelier_corrupt.”

On information and belief, what was “twittered” were the same false, defamatory statements; and masking sites maintained by Defendant GoDaddy.com identified in paragraph 11 sent computer users to the post described in this paragraph 21.

22. That same day, July 1, 2009, another post was made, on information and belief, by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10 at atelierowners.wordpress.com by Defendant Wordpress.com under the headline “New Networking Web Site Created to Help Atelier Residents

Counter Corruption,” stating, among other things, that:

“It is still unclear at this point whether the death of the building’s Resident Manager, Robert Moricone, today was a murder, a suicide, or something else altogether. However, rumors are flying that Mr. Moricone’s death happened immediately after a meeting with the building’s Board President, Dan Neiditch, and his ‘right-hand-man’, Sabrina Mehmedovic.

“

“For the latest breaking news updates, follow us on Twitter at http://twitter.com/atelier_corrupt.”

This statement was false. There was no lack of clarity to the circumstances of Robert E. Moricone, Jr.’s suicide death; the statement about lack of clarity and possible murder was made to insinuate, falsely, that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were responsible for the death of Robert E. Moricone, Jr.. On information and belief, what was “twittered” were the same false, defamatory statements; and masking sites maintained by Defendant GoDaddy.com identified in paragraph 11 sent computer users to the post described in this paragraph 22.

23. Meanwhile, in the days that followed on July 6-7, 2009, at a site maintained by Defendant Ning.com, and further transmitted by Twitter, Inc. and GoDaddy,.com, the following false statements were made, on information and belief, by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10:

“[Q]uestions are being raised and rumors are flying that Neiditch and Sabrina Mehmedovic’s scandalous corruption has finally led to it’s [sic] first real death.”

“It is so sad that people like Sabrina and Daniel think they can play with people life’s Poor Robert had to deal with them and look what happened to him. Don’t you people wonder why he wanted [S]abrina in his apartment she was causing [sic] him pain pain [sic] he never felt before she’s the reason he’s Dead.”

“[S]abrina and [D]aniel did nothing but steal the buildings money and cause pain to people’s lives.”

"[S]abrina and [D]aniel drove Robert Moricone my very close friend to his death. . . ."

"[E]very employee who does not participate in Dan's and Sabrina's little crime syndicate -- or who work here long enough to 'know too much' -- are routinely fired."

"Daniel Neiditch is a CROOK he should be behind bars."

"We need to retaliate against Daniel Neiditch and Sabrina Mehmedovic. They killed Robert Mericone so now we should get revenge."

"[Y]es, he steals. . . . Daniel Neiditch should be behind bars, he is the biggest crook in the world."

"[O]ne of Roberts close friends whose name will stay unsaid was there when [S]abrina went up to his apartment hearing Rob say 'look what you did to me look where this is leading!'"

"[I]t breaks my heart to know that his death may have been caused by terrible, greedy people."

"Some don't like the word murder. I feel that you can call it whatever you want to call it, but I strongly feel that Dan and Sabrina and company are directly responsible for Robert's death. If they end up sued for \$100,000,000 by Robert's family, that would not be a drop in the bucket toward bringing poor Robert back. And if Dan and Sabrina and company are capable of all of this, I believe that if under enough pressure they are totally capable of murder. We already know that they enter people's apartments when they are not home, they remove property, they could just as easily plant something in your apartment. Or just hide in your apartmet [sic] and wait for you to get home. These are not petty criminals we're dealing with. Bernie Madeoff [sic] stole people's money, but as far as I know he didn't enter people's homes or murder anyone. He was directly responsible for some suicides though, wasn't he."

On information and belief, the same false, defamatory statements were "twittered"; and masking sites maintained by Defendant GoDaddy.com identified in paragraph 11 sent computer users to the post described in this paragraph 23.

24. By e-mail dated July 8, 2009, Plaintiff Daniel Neiditch wrote to Defendant Ning.com

complaining specifically of the last quoted post in paragraph 23 above. Also, by letter dated July 8, 2009, legal counsel to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic wrote to Defendant Ning.com:

“By this letter you are hereby on notice that the site contains outright false statements of fact, knowingly made, which are likely to damage those about whom the statements are made. As such, the website contains defamatory and libelous remarks which could subject both those authoring such statements and those aiding in its publication to severe civil liability.

“We note with special severity, outright threats being made against individuals and insinuations correlating the tragic death of Robert Maricone [sic] with false allegations of the Atelier’s board’s conduct. . . .

“As attorneys we value free speech, assembly and the benefits of both, especially in a context that utilizes the gifts of modern technology in such a manner as to help elicit as much discussion, exchange and opinion as possible.

“We do not endorse the use of such technology irresponsibly or to damage people, however.”

The letter continued with many of the quotations stated in paragraph 23 above and other quotations. In response to both the e-mail by Plaintiff Daniel Neiditch and the letter of counsel, however, Defendant Ning.com refused to take down these comments.

25. After the communications by Plaintiff Daniel Neiditch and counsel sent to Defendant.Ning.com, the campaign of harassing defamation continued. On July 9, 2009, at a site maintained by Defendant Ning.com, and further transmitted by Twitter, Inc. and GoDaddy,.com, the following false statements were made, on information and belief, by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10:

“Maybe Robert wanted Sabrina to be there to watch him kill himself so that she would be even more haunted by what she has done to cause this, and she would have

more vivid nightmares about how her and Dan's actions killed him this way."

On information and belief, the same false, defamatory statements were "twittered"; and masking sites maintained by Defendant GoDaddy.com identified in paragraph 11 sent computer users to the post described in this paragraph 25.

AS AND FOR A FIRST CAUSE OF ACTION
(Libel)

26. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 25 as if fully set forth herein.

27. Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, . . . , site of Corruption Mess and One Man Dead So Far" and, as quoted in paragraph 21 above, stating that Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were guilty of "corruption, bribery, extortion, payoffs, etc.", that "Involved, said to include: Atelier Board President, Dan Neiditch, down to Super, Robt. & mangr, Sabrina Mehmedovic. Leads to ONE DEAD!!!" and that "Atelier Board Pres. Dan Neiditch runs a corrupt operation. . . .":

(a) The specific statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 27 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch, Plaintiff

Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 27 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 27 are defamatory *per se* against Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr..

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 27 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 27 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 27 were damaging to Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr..

28. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch, Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, . . ., site of Corruption Mess and One Man Dead So Far" and accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. of "corruption, bribery, extortion, payoffs, etc." as quoted in paragraph 27 above.

29. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta

Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc., and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained above in paragraph 27 above.

30. There should be an award of damages to Plaintiffs Daniel Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blato Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 27 being made willfully, wantonly and maliciously.

AS AND FOR A SECOND CAUSE OF ACTION
(Libel)

31. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 30 as if fully set forth herein.

32. Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, . . . , site of Corruption Mess and One Man Dead So Far" and accusing, as quoted in paragraph 21 above, Plaintiffs Daniel Neiditch and Sabrina Mehmedovic of holding a closed door meeting with Robert E. Moricone, Jr. that upset him because it "assume[d] Robert was asked to do more corrupt cover-up type things, lies,

etc.” and that these sort of lies, cover-ups, scams, tyranny are all the norm for the corruption with Atelier board pres. Dan Neiditch”:

(a) The specific statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 32 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 32 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 32 are defamatory *per se* against Plaintiffs Daniel Neiditch, Sabrina Mehmedovic and Robert E. Moricone, Jr..

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 32 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 32 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 32 were damaging to Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr..

33. A declaration of rights should be issued by the Court that Plaintiff Daniel Neiditch,

Plaintiff Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blato Behluli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, . . ., site of Corruption Mess and One Man Dead So Far" and accusing Plaintiff Dan Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 32.

34. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blato Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 32.

35. There should be an award of damages to Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blato Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch, and Sabrina Mehmedovic and Robert E. Moricone, Jr. to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 32 being made willfully, wantonly and maliciously.

AS AND FOR A THIRD CAUSE OF ACTION
(Libel)

36. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 35 as if fully set forth herein.

37. Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging

by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, . . . , site of Corruption Mess and One Man Dead So Far" and stating in reference to the announcement of Robert E. Moricone, Jr.'s death, as quoted in paragraph 21 above, that "Many Atelier residents know what's been going on for some time & are demanding Criminal Charges be levied against Dan Neiditch, . . . Sabrina Mehmedovic, and a few other conspirators":

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 37 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 37 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 37 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 37 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 37 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements

as quoted above in this paragraph 37 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

38. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "Atelier Building, New York home of Lindsay Lohan, Vanessa Mannillo and Nick Lachey, site of Corruption Mess and One Man Dead So Far" and accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 37.

39. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 37.

40. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 37 being made willfully, wantonly and maliciously.

AS AND FOR A FOURTH CAUSE OF ACTION
(Libel)

41. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 40 as if fully set

forth herein.

42. Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blaerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "New Networking Web Site Created to Help Atelier Residents Counter Corruption," stating, as quoted in paragraph 22 above, that:

"It is still unclear at this point whether the death of the building's Resident Manager, Robert Moricone, today was a murder, a suicide, or something else altogether. However, rumors are flying that Mr. Moricone's death happened immediately after a meeting with the building's Board President, Dan Neiditch, and his 'right-hand-man', Sabrina Mehmedovic.

(a) The specific statements accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 42 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 42 are false.

(c) The aforesaid factual accusations accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 42 are defamatory *per se* against Plaintiffs Dan Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 42 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 42 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 42 were damaging to Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr..

43. A declaration of rights should be issued by the Court that Plaintiff Dan Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com under the headline "New Networking Web Site Created to Help Atelier Residents Counter Corruption," and accusing Plaintiff Dan Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 42.

44. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 42.

45. There should be an award of damages to Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above

in paragraph 42 being made willfully, wantonly and maliciously.

AS AND FOR A FIFTH CAUSE OF ACTION
(Libel)

46. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 45 as if fully set forth herein.

47. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy.com stating, as quoted in paragraph 23 above, that:

“[Q]uestions are being raised and rumors are flying that Neiditch and Sabrina Mehmedovic’s scandalous corruption has finally led to it’s [sic] first real death.”

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 47 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 47 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 47 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 47 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those

communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 47 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 47 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

48. A declaration of rights should be issued by the Court that Plaintiffs Dan Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 47.

49. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and Go.Daddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 47.

50. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 47 being made willfully, wantonly and maliciously.

**AS AND FOR A SIXTH CAUSE OF ACTION
(Libel)**

51. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 50 as if fully set forth herein.

52. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behukuli, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy.com, stating, as quoted in paragraph 23 above, that:

“It is so sad that people like Sabrina and Daniel think they can play with people life’s Poor Robert had to deal with them and look what happened to him. Don’t you people wonder why he wanted [S]abrina in his apartment she was causeing [sic] him pain pain [sic] he never felt before she’s the reason he’s Dead.”

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 52 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 52 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 52 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 52 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those

communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 52 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 52 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

53. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 52.

54. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 52.

55. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 52 being made willfully, wantonly and maliciously.

AS AND FOR A SEVENTH CAUSE OF ACTION
(Libel)

56. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 55 as if fully set forth herein.

57. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that:

“[S]abrina and [D]aniel did nothing but steal the buildings money and cause pain to people’s lives.”

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 57 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 57 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 57 are defamatory *per se* against Plaintiffs Dan Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 57 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 57 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 57 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

58. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 57.

59. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 57.

60. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 57 being made willfully, wantonly and maliciously.

AS AND FOR AN EIGHTH CAUSE OF ACTION
(Libel)

61. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 60 as if fully set forth herein.

62. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that:

“[S]abrina and [D]aniel drove Robert Moricone my very close friend to his death. . . .”

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 62 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 62 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 62 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 62 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 62 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 62 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

63. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 62.

64. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 62.

65. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerts Behululi, Sebastain Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 62 being made willfully, wantonly and maliciously.

AS AND FOR A NINTH CAUSE OF ACTION
(Libel)

66. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 65 as if fully set forth herein.

67. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that:

“[E]very employee who does not participate in Dan’s and Sabrina’s little crime syndicate -- or who work here long enough to ‘know too much’-- are routinely fired.”

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 67 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 67 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 67 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 67 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those

communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 67 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 67 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

68. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 67.

69. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 67.

70. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc., and GoDadday.com for damages to Plaintiffs Dan Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 65 being made willfully, wantonly and maliciously.

AS AND FOR A TENTH CAUSE OF ACTION
(Libel)

71. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 70 as if fully set forth herein.

72. Plaintiffs Daniel Neiditch was libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that: "Daniel Neiditch is a CROOK he should be behind bars."

(a) The specific statements accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 72 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 72 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 72 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 72 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff

Daniel Neiditch as quoted above in this paragraph 72 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 72 were damaging to Plaintiff Daniel Neiditch.

73. A declaration of rights should be issued by the Court that Plaintiff Daniel Neiditch was libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com and Twitter, Inc. accusing Plaintiff Dan Neiditch as quoted above in paragraph 72.

74. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 72.

75. There should be an award of damages to Plaintiffs Daniel Neiditch from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, Sebastian Christopher, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, Twitter, Inc. and GoDaddy.com for damages to Plaintiff Daniel Neiditch to compensate for losses and injuries suffered by him and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 72 being made willfully, wantonly and maliciously.

AS AND FOR AN ELEVENTH CAUSE OF ACTION
(Libel)

76. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 75 as if fully set forth herein.

77. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged

defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that: "We need to retaliate against Daniel Neiditch and Sabrina Mehmedovic. They killed Robert Mericone so now we should get revenge."

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 77 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 77 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 77 are defamatory *per se* against Plaintiffs Dan Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 77 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 77 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 77 were damaging to Plaintiffs Daniel Neiditch and Sabrina

Mehmedovic.

78. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 77.

79. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 77.

80. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 77 being made willfully, wantonly and maliciously.

AS AND FOR A TWELFTH CAUSE OF ACTION
(Libel)

81. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 80 as if fully set forth herein.

82. Plaintiff Daniel Neiditch was libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura

Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that: “[Y]es, he steals. . . Daniel Neiditch should be behind bars, he is the biggest crook in the world.”

(a) The specific statements accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 82 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 82 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 82 are defamatory *per se* against Plaintiffs Daniel Neiditch.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 82 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch as quoted above in this paragraph 82 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 82 were damaging to Plaintiff Daniel Neiditch.

83. A declaration of rights should be issued by the Court that Plaintiff Daniel Neiditch was libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch as quoted above in paragraph 82.

84. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 82.

85. There should be an award of damages to Plaintiff Daniel Neiditch from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiff Daniel Neiditch to compensate for losses and injuries suffered by him and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 82 being made willfully, wantonly and maliciously.

AS AND FOR A THIRTEENTH CAUSE OF ACTION
(Libel)

86. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 85 as if fully set forth herein.

87. Plaintiffs Daniel Neiditch, Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that: "[O]ne of Roberts close friends whose name will stay unsaid was there when [S]abrina went up to his apartment hearing Rob say 'look what you did to me look where this is leading!'"

(a) The specific statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina

Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 87 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 87 are false.

(c) The aforesaid factual accusations against Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 87 are defamatory *per se* against Plaintiffs Dan Neiditch and Sabrina Mehmedovic and Robert E. Moricone, Jr..

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 87 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in this paragraph 87 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 87 were damaging to Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr..

88. A declaration of rights should be issued by the Court that Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina

Mehmedovic as quoted above in paragraph 87.

89. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 87.

90. There should be an award of damages to Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiffs Dan Neiditch, Sabrina Mehmedovic and Estate of Robert E. Moricone, Jr. to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 87 being made willfully, wantonly and maliciously.

AS AND FOR A FOURTEENTH CAUSE OF ACTION
(Libel)

91. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 90 as if fully set forth herein.

92. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy.com, stating, as quoted in paragraph 23 above, that: "[I]t breaks my heart to know that his death may have been caused by terrible, greedy people."

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 92 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 92 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 92 are defamatory *per se* against Plaintiffs Dan Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in this paragraph 92 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Dan Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 92 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in this paragraph 92 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

93. A declaration of rights should be issued by the Court that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 92.

94. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 92.

95. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 92 being made willfully, wantonly and maliciously.

AS AND FOR A FIFTEENTH CAUSE OF ACTION
(Libel)

96. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 95 as if fully set forth herein.

97. Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled with non-privileged defamatory false statements of fact that were culpably published and that were damaging by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, at a site maintained by Defendant Ning.com, and further transmitted by Defendants Twitter, Inc. and GoDaddy,.com, stating, as quoted in paragraph 23 above, that:

“Some don't like the word murder. I feel that you can call it whatever you want to call it, but I strongly feel that Dan and Sabrina and company are directly responsible for Robert's death. If they end up sued for \$100,000,000 by Robert's family, that would not be a drop in the bucket toward bringing poor Robert back. And if Dan and Sabrina and company are capable of all of this, I believe that if under enough pressure they are totally capable of murder. We already know that they enter people's

apartments when they are not home, they remove property, they could just as easily plant something in your apartment. Or just hide in your apartment [sic] and wait for you to get home. These are not petty criminals we're dealing with. Bernie Madeoff [sic] stole people's money, but as far as I know he didn't enter people's homes or murder anyone. He was directly responsible for some suicides though, wasn't he."

(a) The specific statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 97 are factual in nature and not opinion.

(b) The aforesaid factual statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 97 are false.

(c) The aforesaid factual accusations accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in this paragraph 97 are defamatory *per se* against Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

(d) The aforesaid defamatory and false statements as quoted above in paragraph 97 were not privileged, as the communications were not made in the kind of circumstances in which an absolute protection applies or in which it was necessary or appropriate to make those communications subject to a qualified privilege.

(e) The aforesaid non-privileged, defamatory and false statements accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 97 were culpably uttered.

(f) The aforesaid non-privileged, defamatory, false and culpably uttered statements as quoted above in paragraph 97 were damaging to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic.

98. A declaration of rights should be issued by the Court that Plaintiffs Dan Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta

Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 97.

99. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 97.

100. There should be an award of damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiffs Daniel Neiditch and Sabrina Mehmedovic to compensate for losses and injuries suffered by them and for punitive damages due to aforesaid Defendants' libelous statements as quoted above in paragraph 97 being made willfully, wantonly and maliciously.

AS AND FOR A SIXTEENTH CAUSE OF ACTION
(Tortious Interference With Prospective Business Relations)

101. Plaintiffs repeats and realleges the allegations of paragraphs 1 through 100 as if fully set forth herein.

102. Plaintiff Daniel Neiditch has a business as a real estate broker whose business has suffered economically from the defamatory statements that are identified above and that are the subject of the causes of action in this Complaint. The Defendants named herein have knowledge of the prospective business relations of Plaintiff Daniel Neiditch, have intentionally, wilfully and with malice to interfere with those prospective business relations, have no privilege justifying that tortious

interference and thus have proximately caused pecuniary damage to Plaintiff Daniel Neiditch's business as a broker.

103. A declaration of rights should be issued by the Court that Plaintiff Daniel Neiditch's prospective business relations have been tortiously interfered with by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Ning.com, GoDaddy.com and Twitter, Inc. as described above in paragraph 102.

104. An injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Ning.com, GoDaddy.com and Twitter, Inc. cease and desist from tortiously interfering with the prospective business relations of Plaintiff Daniel Neiditch.

105. There should be an award of damages to Plaintiff Daniel Neiditch from Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Ning.com, GoDaddy.com and Twitter, Inc. for damages to Plaintiff Daniel Neiditch to compensate for losses and injuries suffered by him from the tortious interference with prospective business relations and for punitive damages due to aforesaid Defendants' conduct as described above being done willfully, wantonly and maliciously.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand Judgment as follows:

(i) on the First Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. under the headline "Atelier Building, . . . , site of

Corruption Mess and One Man Dead So Far” and accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. of “corruption, bribery, extortion, payoffs, etc.” as quoted in paragraph 27 above;

(ii) on the First Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained above in paragraph 27;

(iii) on the First Cause of Action, an award of \$12,000,000.00, with interest;

(iv) on the Second Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10 and Wordpress.com, GoDaddy.com and Twitter, Inc. under the headline “Atelier Building. . . , site of Corruption Mess and One Man Dead So Far” and accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in paragraph 32;

(v) on the Second Cause of Action, an injunction that requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 32;

(vi) on the Second Cause of Action, an award of \$12,000,00.00, with interest;

(vii) on the Third Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com,

GoDaddy.com and Twitter, Inc. under the headline "Atelier Building, . . ., site of Corruption Mess and One Man Dead So Far" and accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 37;

(viii) on the Third Cause of Action, an injunction that requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 37;

(ix) on the Third Cause of Action, an award of \$12,000,000.00, with interest;

(x) on the Fourth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. under the headline "NewNetworking Web Site Created to Help Atelier Residents Counter Corruption," and accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in paragraph 42;

(xi) on the Fourth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 42;

(xii) on the Fourth Cause of Action, an award of \$12,000,000.00, with interest;

(xiii) on the Fifth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com,

GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 47;

(xiv) on the Fifth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 47;

(xv) on the Fifth Cause of Action, an award of \$12,000,000.00, with interest;

(xvi) on the Sixth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 52;

(xvii) on the Sixth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 52;

(xv) on the Sixth Cause of Action, an award of \$12,000,000.00, with interest;

(xvi) on the Seventh Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 57;

(xvii) on the Seventh Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 57;

(xviii) on the Seventh Cause of Action, an award of \$12,000,000.00, with interest;

(xix) on the Eighth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 62;

(xx) on the Eighth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 62;

(xxi) on the Eighth Cause of Action, an award of \$12,000,000.00, with interest;

(xxii) on the Ninth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and his assistant Plaintiff Sabrina Mehmedovic as quoted above in paragraph 67;

(xxiii) on the Ninth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through

10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 67;

(xxiv) on the Ninth Cause of Action, an award of \$12,000,000.00, with interest;

(xxv) on the Tenth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 72;

(xxvi) On the Tenth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 72;

(xxvii) on the Tenth Cause of Action, an award of \$12,000,000.00, with interest;

(xxviii) on the Eleventh Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 77;

(xxix) on the Eleventh Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 77;

(xxx) on the Eleventh Cause of Action, an award of \$12,000,000.00, with interest;

(xxxii) on the Twelfth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 82;

(xxxiii) on the Twelfth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 82;

(xxxiv) on the Twelfth Cause of Action, an award of \$12,000,000.00, with interest;

(xxxv) on the Thirteenth Cause of Action, a declaration of rights that Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch, Plaintiff Sabrina Mehmedovic and Robert E. Moricone, Jr. as quoted above in paragraph 87;

(xxxvi) On the Thirteenth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 87;

(xxxvii) on the Thirteenth Cause of Action, an award of \$12,000,000.00, with interest;

(xxxviii) on the Fourteenth Cause of Action, a declaration of rights that Plaintiffs

Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 92;

(xxxix) on the Fourteenth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 92;

(xxxx) on the Fourteenth Cause of Action, an award of \$12,000,000.00, with interest;

(xxxxi) on the Fifteenth Cause of Action, a declaration of rights that Plaintiffs Daniel Neiditch and Sabrina Mehmedovic were libeled by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. accusing Plaintiff Daniel Neiditch and Plaintiff Sabrina Mehmedovic as quoted above in paragraph 97;

(xxxixii) on the Fifteenth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Ning.com, GoDaddy.com and Twitter, Inc. take down and/or otherwise cease and desist from publishing the statements complained of above in paragraph 97;

(xxxixiii) on the Fifteenth Cause of Action, an award of \$12,000,000.00, with interest;

(xxxixiv) on the Sixteenth Cause of Action, a declaration of rights that the prospective business relations of Plaintiff Daniel Neiditch have been tortiously interfered with by Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1

through 10, Wordpress.com, Ning.com, GoDaddy.com and Twitter, Inc. as described herein;

(xxxxv) on the Sixteenth Cause of Action, an injunction requiring that Defendants Caglar Aclar, Laura Qoku, Adrian Zaini, Blerta Behululi, John Does 1 through 10 and Jane Does 1 through 10, Wordpress.com, Ning.com, GoDaddy.com and Twitter, Inc. cease and desist from tortiously interfering with the prospective business relations of Plaintiff Daniel Neiditch as described herein;

(xxxxvi) on the Sixteenth Cause of Action, an award of \$10,000,000.00, with interest;

and

(xxxiv) payment of legal fees, expert fees and costs to Plaintiffs incurred in this action and such further and other relief as deemed just and proper by the Court.

**Dated: New York, New York
July 28, 2009**

NESENOFF & MILTENBERG, LLP
Attorneys for Plaintiffs

By: 

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Index No:

Year: 2009

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

-----X
**DANIEL NEIDITCH, SABRINA MEHMEDOVIC,
and ESTATE OF ROBERT E. MORICONE, JR.,**

Plaintiffs,

-against-

**CAGLAR ACAR, LAURA QOKU, ADRIAN ZAINI,
BLERTA BEHLULI, SEBASTIAN CHRISTOPHER,
NING.COM, GODADDY.COM, WORDPRESS.COM,
TWITTER, INC., JOHN DOES 1 through 10, and
JANE DOES 1 through 10,**

FILED

JUL 29 2009

**COUNTY CLERK'S OFFICE
NEW YORK**

Defendants.
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SUMMONS AND COMPLAINT

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