

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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ROSEANN CORBETT,

Plaintiff,

- against -

LINDENWOOD GARDENS COOPERATIVE, INC.,
AND ESQUIRE MANAGEMENT CORP.,

Defendants,

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LINDENWOOD GARDENS COOPERATIVE, INC.,
AND ESQUIRE MANAGEMENT CORP.,

Third-Party Plaintiff,

- against -

DARP TOW INC.,

Third-Party Defendant.

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PLEASE TAKE NOTICE, that pursuant to CPLR §3101 and Rule 3120, Third-Party Defendant, DARP TOW INC., by its attorneys, BLACK MARJIEH & SANFORD LLP, makes the following demands, returnable to their office, within thirty (30) days of receipt of this demand, the following:

1. Original duly executed authorization(s) for full access to and copies of any and all of plaintiff's historical content on any internet/web based social media and/or networking websites, including but not limited to, Facebook, MySpace, Twitter, LinkedIn, Google, Vimeo, Snapshot, etc., including all site materials, deleted pages, related information, personal information, comments, messages, photographs and videos and logged IP addresses, as well as preservation of the materials. The authorization(s) should include the e-mail address linked to each account and any other identifying information linked to each account. If no such social networking account exists, provide an affidavit to this effect.

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**DEMAND FOR
INTERNET/WEB BASED
SOCIAL MEDIA AND/OR
NETWORKING
WEBSITES**

2. A demand is herein made for the preservation of all plaintiff's internet/web based social networking websites and accounts, including the preservation of all photographs, video recordings, essays, e-mails, blogs, chat room discussions and statements contained within or associated with plaintiffs' Facebook, MySpace, Twitter, LinkedIn, Vimeo, Snapshot, etc.

3. These demands shall be deemed to continue during the pendency of this action, if any of the above-requested information or documents are subsequently obtained.

PLEASE TAKE FURTHER NOTICE, that the foregoing are continuing demands and that if any of the above items are obtained after the date of this Demand, they are to be furnished to BLACK MARJIEH & SANFORD LLP, pursuant to these demands.

Dated: Elmsford, New York
July 21, 2023

BLACK MARJIEH & SANFORD LLP
Attorneys for Third-Party Defendant
Darp Tow Inc.

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