

SHORT RECORD
NO. 22-2621
FILED 09/15/2022

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION

G.G., *et al.*

Plaintiffs,

v.

SALESFORCE.COM, INC.,

Defendant.

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CIVIL ACTION NO. 20-CV-02335

Honorable Andrea R. Wood

PLAINTIFFS' NOTICE OF APPEAL

Notice is hereby given that G.G. and Deanna Rose, the Plaintiffs in the above-named case, hereby appeal to the United States Court of Appeals for the Seventh Circuit from the Court's Memorandum Opinion and Order (Dkt. 105) and Judgment (Dkt. 106), entered May 16, 2022, and from the Court's order denying Plaintiffs' Motion to Alter or Amend the Judgment Under Rule 59(e) (Dkt. 114), entered August 15, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this Notice of Appeal was served on the following via the Court's ECF system on the 13th day of September 2022.

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**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.6.3
Eastern Division**

G G (a minor), et al.

Plaintiff,

v.

Case No.: 1:20-cv-02335

Honorable Andrea R. Wood

Salesforce.com, Inc., et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Monday, May 16, 2022:

MINUTE entry before the Honorable Andrea R. Wood: For the reasons stated in the accompany Memorandum Opinion and Order, Defendant's motion to dismiss the third amended complaint [63] is granted. The third amended complaint is dismissed with prejudice. The Clerk is directed to enter judgment in favor of Defendant. Civil case terminated. Mailed notice (dal,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

G.G. (a minor), et al.,)	
)	
Plaintiffs,)	
)	No. 20-cv-02335
v.)	
)	Judge Andrea R. Wood
SALESFORCE.COM, INC.,)	
)	
Defendants.)	

MEMORANDUM OPINION AND ORDER

When G.G. was thirteen years old, she ran away from home and fell into the hands of a sex trafficker. The trafficker posted advertisements for sex with G.G. on the classified ad website run by Backpage.com (“Backpage”).¹ As alleged in the complaint, Backpage did not just allow but encouraged these types of illegal ads, to the point of becoming a dominant force in online sex trafficking. Beginning in 2013, Backpage contracted with Defendant Salesforce.com, Inc. (“Salesforce”) to provide it with customer relationship management (“CRM”) business software and support. That relationship allegedly helped grow Backpage’s operations, including promoting the business of sex traffickers. G.G. and her mother, Deanna Rose, (together, “Plaintiffs”) have now sued Salesforce pursuant to 18 U.S.C. § 1595, alleging that, through its contracts with Backpage, Salesforce violated the federal anti-trafficking laws by knowingly benefiting from and participating in a venture that it knew, or should have known, was engaged in illegal sex trafficking. Salesforce has filed a motion to dismiss the complaint in its entirety pursuant to

¹ The Third Amended Complaint, which is the operative complaint, includes Backpage as a defendant. Before Backpage answered the Third Amended Complaint, however, the Court granted Plaintiffs’ motion voluntarily to dismiss Backpage from this suit. (Dkt. No. 101.)

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