

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

JUDITH GOLDITCH, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

ALPHABET, INC., GOOGLE, INC.,  
and GOOGLE, LLC.,

Defendants.

Case No.

**CLASS ACTION COMPLAINT**

**DEMAND FOR JURY TRIAL**

Plaintiff Judith Golditch (“Plaintiff”), on behalf of herself and all others similarly situated, hereby submits the following Class Action Complaint (“Complaint”) against Alphabet Inc., Google, Inc., and Google, LLC (“Defendants”) and upon personal knowledge as to her own acts and status, and upon information and belief, the investigation of her counsel, and the facts that are a matter of public record, as to all other matters, alleges as follows:

**NATURE OF THE ACTION AND PLAINTIFF’S CLAIMS**

1. Defendants comprise a multinational company that specializes in Internet-related services and products, which include online advertising technologies, search engines, cloud computing, software and hardware products.
2. Defendants advertise, market, and sell various products on the website URL address “google.com” (the “Google Website”) in Massachusetts and throughout the United States.
3. At all times relevant the Google Website was owned or controlled by Defendants.

4. Defendants derive a substantial portion of their revenues from advertising products to consumers and others on the Google Website.

5. Defendants sometimes refer to the Google Website as “Google Buys” or “Google Shopping.”

6. Defendants realize revenue from the sale of each product advertised on the Google Website.

7. The greater the number of sales of a product on the Google Website, the greater the revenues and profits realized by Defendants.

8. The recent pandemic of the potentially fatal Coronavirus has prompted increased interest in so-called “germ killing” products including surface-cleaners.

9. One such surface-cleaner is a product in various sizes sold under the Pine-Sol brand name (the “Product”).

10. The Product competes directly with numerous other surface-cleaning products.

11. On March 4, 2020, Plaintiff purchased the Product which was advertised on the Google Website as follows: “Pine-Sol Multi Surface Cleaner – 2 pack, 100 fl oz” (“Plaintiff’s Product”) on a webpage linked to the Google Website at the following URL:

[https://www.google.com/shopping/product/18246641905544109501?q=pine+sol+online+bestellen&prds=epd:6676307831759892082,prmr:3,tpim:COv8z92qgJ-X1QEQhJzGttPYpYcHGLCEjgciA1VTRCjPl-nxBTCxsdYC,pdprs:5&utm\\_medium=tu\\_cu&utm\\_content=eid-lsjeuxoeqt&utm\\_campaign=5609649&gclid=CjwKCAiA98TxBRBtEiwAVRLqu67JOyL1blX6geGEQdle6XxJLnQcorpZd6UqLE3ZUeFintlv5-YCAxoCGt8QAvD\\_BwE](https://www.google.com/shopping/product/18246641905544109501?q=pine+sol+online+bestellen&prds=epd:6676307831759892082,prmr:3,tpim:COv8z92qgJ-X1QEQhJzGttPYpYcHGLCEjgciA1VTRCjPl-nxBTCxsdYC,pdprs:5&utm_medium=tu_cu&utm_content=eid-lsjeuxoeqt&utm_campaign=5609649&gclid=CjwKCAiA98TxBRBtEiwAVRLqu67JOyL1blX6geGEQdle6XxJLnQcorpZd6UqLE3ZUeFintlv5-YCAxoCGt8QAvD_BwE)

12. At the time of Plaintiff’s purchase of Plaintiff’s Product, the Google Website depicted the front portion of the Product label which contained a representation in prominent print as follows: **“Kills 99.9% of Germs.”**

13. At the time of Plaintiff's purchase of Plaintiff's Product, the Google Website contained an additional representation in prominent print as follows: ***"Kills 99.9% germs at home and work."***

14. Despite the Product label and additional representation (individually and collectively, the "Representation(s)") concerning the killing of 99.9% of germs, there are no reliable studies that support the Representations.

15. On information and belief, the Product does not kill a variety of germs and/or bacteria including certain germs/bacteria that cause a variety of diseases (the "Diseases"), including certain strains of influenza, Ebola, and norovirus.

16. By each Representation, reasonable consumers are led to believe that proper use of the Product will prevent the Diseases and will kill at least 99.9% of all germs that cause all illnesses in human beings.

17. The Representation on the Product label and on the Google Website each is false and misleading as the Product when used as directed does not kill 99.9% of all germs.

18. Each Representation is harmful, deceptive and misleading to consumers and other purchasers because it gives the misleading impression that using the Product will prevent the Diseases and all other human illnesses, including SARS Covid-2, the illness caused by the COVID-19 virus (i.e., the "Coronavirus").

19. Each Representation allows Defendants to unlawfully increase their revenues and profits derived from sales of the Product.

20. Each Representation gives Defendants a competitive edge over many competing products including, by example, competitive products that expressly state that the product is effective in reducing and/or killing only a limited number and/or specified germs.

21. The Defendants' conduct caused Plaintiff and others similarly situated to suffer damages requiring disgorgement and restitution as well entitling them to injunctive relief.

22. The Product is unable to provide the outcomes promised by the Defendants in the Representations.

23. The Defendants' marketing of the Product with the Representations is designed to – and did – to the knowledge of Defendants, deceive, mislead and defraud consumers and others that purchased the Product on the Google Website.

24. The Defendants' false, deceptive and misleading marketing and sale of the Product has enabled Defendants to sell more of the Product than they would have in the absence Defendants' misconduct.

25. The Defendants' false, deceptive and misleading marketing and sale of the Product has enabled Defendants to sell the Product and at higher prices per unit than they would have in the absence Defendants' misconduct.

26. Defendants' misconduct alleged above results in additional revenues to Defendants at the expense of consumers and other purchasers of the Product from the Google Website.

27. The value of the Plaintiff's Product purchased from the Google Website was materially less than its value as represented by the Defendants.

28. Had Plaintiff and class members known the truth, they would not have bought the Product, or would have paid less for it.

29. As a result of each false and misleading Representation, the Product is sold at a premium price compared to other similar products sold in a way that is not misleading.

30. As a result of Defendants' false and deceptive Representations, Plaintiff and the other members of the proposed Class have purchased a product that has not been proven to perform

as advertised. This action seeks to obtain redress for purchasers the Product from the Google Website, and to enjoin Defendants' deceptive and unlawful advertising as well as to obtain other equitable relief. Plaintiff brings this lawsuit against Defendants on behalf of herself and all other similarly situated who purchased the Product in the United States from the Google Website.

### **JURISDICTION AND VENUE**

31. This Court has jurisdiction over the subject matter presented by this Complaint under 28 U.S.C. § 1332(d)(2)(A) because it is a class action arising under the Class Action Fairness Act of 2005 ("CAFA"), Pub. L. No. 109-2, 119 Stat. 4 (2005), which explicitly provides for the original jurisdiction of the Federal Courts of any class action in which any member of the Class is a citizen of a State different from any Defendant, there are more than 100 members and in which the matter in controversy exceeds in the aggregate sum of \$5,000,000.00, exclusive of interest and costs.

32. The total claims of individual Class members in this action are in excess of \$5,000,000.00 in the aggregate, exclusive of interest and costs, as required by 28 U.S.C. §§ 1332(d)(2) and (6).

33. Plaintiff is a citizen and resident of the Commonwealth of Massachusetts, whereas Defendants are citizens of Delaware and/or Florida for purposes of CAFA and relevant diversity requirements.

34. This Court has personal jurisdiction over the Defendants because Defendants conduct business in Massachusetts through the Google Website, and sell products to consumers and others in Massachusetts via the Google Website.

35. Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims herein occurred in this District and because Plaintiff resides in this District.

### **PARTIES**

36. Plaintiff Judith Golditch is a resident of the Commonwealth of Massachusetts, and was exposed to Defendants' deceptive and misleading statements (i.e., the Representation) in Massachusetts through purchase of the Product on the Google Website. Had Plaintiff known the truth concerning the Representation, she would not have purchased the Product.

37. Defendant Alphabet, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway Mountain View, CA 94043.

38. Defendant Google, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway Mountain View, CA 94043.

39. Defendant Google, LLC is a limited liability company organized and existing under the laws of the State of Delaware, with its principal place of business at 1600 Amphitheatre Parkway Mountain View, CA 94043.

40. At all times herein, Defendants' respective agents, employees, representatives, and owners, were acting within the course and scope of such agency, employment, and representation, on behalf of Defendants.

### **CLASS ACTION ALLEGATIONS**

41. Plaintiff sues under Rule 23(a), (b)(2) and Rule 23(b)(3) of the Federal Rules of Civil Procedure, on behalf of herself and a Class defined as follows:

all persons in the United States who purchased the Product during the period from June 16, 2017 until notice is disseminated to the Class. Excluded from the Class are Defendants and their respective affiliates, and the officers, directors, and employees of Defendants and Defendants' affiliates.<sup>1</sup>

42. This case is also brought on behalf of a subclass of the Class consisting of all persons who purchased the Product in the Commonwealth of Massachusetts from the Google Website, during the period from June 16, 2017 until notice is disseminated to the Class (the "Massachusetts Class").

43. The definition of the Class is unambiguous.

44. Plaintiff is a member of the Class she seeks to represent.

45. Class Members can be notified of the class action through contact information and/or address lists maintained in the usual course of Defendants' business.

46. Class Members are so numerous and geographically dispersed that the individual joinder of all Class Members is impracticable. The precise number of Class members is unknown to Plaintiff but may be ascertained from Defendants' records. Class Members may be notified of the pendency of this action by recognized, Court approved notice dissemination methods, which may include U.S. Mail, electronic mail, Internet postings, and/or published notice.

47. Additionally, common questions of law and fact predominate over the questions affecting only individual Class Members. Some of the common legal and factual questions include:

- a Whether Defendants had adequate substantiation for each Representation prior to making it;
- b Whether each Representation is true, or is misleading, or reasonably likely to deceive;

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<sup>1</sup> Plaintiff reserves the right to modify or amend the Class definition, as appropriate, during this litigation.

- c Whether the Defendants' alleged misconduct constitutes violations of the laws asserted herein;
- d Whether Defendants are engaged in unfair and/or deceptive advertising with respect to the Product;
- e Whether Defendants have been unjustly enriched;
- f Whether Plaintiff and members of the Class have been injured by Defendants' conduct; and
- g Whether Plaintiff and the Class are entitled to relief, and the amount and nature of such relief.

48. The injuries sustained by the Class Members flow, in each instance, from a common nucleus of operative facts—Defendants' misconduct. In each case Defendants have market the Product in an unfair and deceptive manner.

49. Plaintiff's claims are typical of the claims of the other Class Members because Plaintiff, like all Class Members, bought the Product and was actually deceived.

50. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff is familiar with the basic facts that form the bases of the Class Members' claims. Plaintiff's interests do not conflict with the interests of the other Class Members she seeks to represent. Plaintiff has retained counsel competent and experienced in class action litigation and intends to prosecute this action vigorously. Plaintiff and Plaintiff's counsel will fairly and adequately protect the interests of the Class Members.

51. The class action device is superior to other available means for the fair and efficient adjudication of the claims of Plaintiff and the Class Members. The relief sought per individual members of the Class is small given the burden and expense of individual prosecution of the



potentially extensive litigation necessitated by the conduct of Defendants. It would be virtually impossible for the Class Members to seek redress individually. Even if the Class Members themselves could afford such individual litigation, the court system could not.

52. Individual litigation of the legal and factual issues raised by the conduct of Defendants would increase delay and expense to all parties and to the court system. The class action device presents far fewer management difficulties and provides the benefits of a single, uniform adjudication, economies of scale, and comprehensive supervision by a single court. Given the similar nature of the Class Members' claims and the absence of material differences in the state statutes and common laws upon which the Class Members' claims are based, a nationwide Class will be easily managed by the Court and the parties.

53. Defendants have acted or refused to act on grounds generally applicable to Plaintiff and the Class Members, making appropriate final injunctive relief and declaratory relief regarding Plaintiff and the Class.

### **FIRST CLAIM**

#### **(For Violations of Untrue and Misleading Advertising under Mass. Gen. Laws c. 266, § 91)**

54. Plaintiff incorporates the above allegations by reference as if set forth herein in full.

55. Defendants' marketing, advertising, and promotion and sale of the Product on the Google Website is untrue, deceptive, and/or misleading, in violation of Mass. Gen. Laws c. 266, § 91.

56. At all times relevant to this action, Defendants knew, or could have, upon reasonable investigation, ascertained that the labeling, marketing, advertising, promotion and sale of the Product on the Google Website was untrue, deceptive, and/or misleading.

57. Defendants' untrue, deceptive, and/or misleading marketing, advertising, promotion and sale of the Product on the Google Website has continued throughout the Class Period and is continuing as of the present date.

58. As a purchaser of the Product who was damaged by Defendants' untrue, deceptive and/or misleading advertising (in that Plaintiff and the other Class members purchased a product that did not conform to the representations made about the Product by Defendants), Plaintiff is entitled to and does bring this class action to seek all available remedies under Mass. Gen. Laws c. 266, § 91, including injunctive relief. The injunctive relief would include an order directing Defendants at least to cease their false and misleading advertising, and publish corrective advertising.

## **SECOND CLAIM**

### **(Unjust Enrichment)**

59. Plaintiff incorporates the above allegations by reference as if set forth herein in full.

60. Defendants sold the Product on the Google Website based on its advertised ability to kill 99.9% of all germs, as further described above. However, the Product does not have such capabilities, as further described above.

61. By purchasing the Product from the Google Website, Plaintiff and the Class have conferred a significant monetary benefit on Defendants, which benefit is known and has been appreciated by Defendants.

62. Retention by Defendants of the benefit conferred by Plaintiff and the Class would, under the circumstances, be inequitable.

63. Plaintiff, on behalf of herself and the Class, seeks restitution or, in the alternative, imposition of a constructive trust on the funds inequitably received and retained by Defendants from the sale of the Product made by Defendants on the Google Website.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, on behalf of herself and the members of the Class, prays for judgment against Defendants as follows:

- A. An Order certifying this case as a class action and appointing Plaintiff and her counsel to represent the Class;
- B. An Order awarding restitution and disgorgement of Defendants' revenues from sale of the Product on the Google Website to Plaintiff and each member of the Class;
- C. An Order awarding equitable relief, including: enjoining Defendants from continuing the unlawful false advertising practices as set forth herein, directing Defendants to engage in a corrective advertising campaign, directing Defendants to identify, with Court supervision, victims of their conduct and pay them restitution, and disgorgement of all monies acquired by Defendants by means of any act or practice declared by this Court to be wrongful;
- D. An Order awarding the greater of actual damages (including double or treble damages) or statutory damages, as allowable by law;
- E. An Order awarding attorneys' fees and costs to Plaintiff and the other member of the Class;  
and
- F. Such other and further relief as may be just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial of her claims by jury to the extent authorized by law.

Dated: June 16, 2020

Respectfully submitted,

/s/ Edward L. Manchur

Edward L. Manchur (BBO #316910)

P.O. Box 3156

Peabody, MA 01960

Phone: (978) 333-1013

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***Counsel for Plaintiff Judith Golditch***

JS 44 (Rev. 06/17)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS** Judith Golditch  
10 Bay View Road  
Swampscott MA 01907  
**(b) County of Residence of First Listed Plaintiff** Essex County  
 (EXCEPT IN U.S. PLAINTIFF CASES)

**DEFENDANTS** Alphabet Inc. Google LLC  
and Google Inc  
**County of Residence of First Listed Defendant** \_\_\_\_\_  
 (IN U.S. PLAINTIFF CASES ONLY)

**(c) Attorneys (Firm Name, Address, and Telephone Number)**  
Edward L. Manchur  
P.O. Box 3156  
Peabody MA 01960

**NOTE:** IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.  
 Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

2 U.S. Government Defendant

3 Federal Question (U.S. Government Not a Party)

4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input checked="" type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark
		<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395if) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
		<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** (Place an "X" in One Box Only)

Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from Another District (specify)     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 USC § 1332(d)(2)(A)

Brief description of cause: Misadvertising of Product

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    DEMAND \$ 6,000,000.00    CHECK YES only if demanded in complaint: JURY DEMAND:  Yes     No

**VIII. RELATED CASE(S) IF ANY** (See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE June 16, 2020    SIGNATURE OF ATTORNEY OF RECORD Edward L. Manchur    BBO 316910

FOR OFFICE USE ONLY    RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) Judith Golditch v. Alphabet, Inc.

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

I. 160, 400, 410, 441, 535, 830\*, 835\*, 850, 891, 893, R.23, REGARDLESS OF NATURE OF SUIT.

II. 110, 130, 190, 196, 370, 375, 376, 440, 442, 443, 445, 446, 448, 470, 751, 820\*, 840\*, 895, 896, 899.

III. 120, 140, 150, 151, 152, 153, 195, 210, 220, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 367, 368, 371, 380, 385, 422, 423, 430, 450, 460, 462, 463, 465, 480, 490, 510, 530, 540, 550, 555, 560, 625, 690, 710, 720, 740, 790, 791, 861-865, 870, 871, 890, 950.

\*Also complete AO 120 or AO 121. for patent, trademark or copyright cases.

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?  
YES  NO

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES  NO

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES  NO

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES  NO

7. Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES  NO

A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division  Central Division  Western Division

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division  Central Division  Western Division

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES  NO

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME

Edward L. Manchur (BBO #316910)

ADDRESS

PO BOX 3156 Peabody MA 01960

TELEPHONE NO.

978 333 1013