

CORRESPONDENCE BETWEEN CHRISTOPHER PARIS AND WWW.GOOGLE.COM

Link to Google’s removal tool:

<https://support.google.com/legal/answer/3110420?rd=1>

Screenshot:

If you've come across content on Google that may violate the law, let us know, and we'll carefully review the material and consider blocking, removing or restricting access to it. Abusive content on Google's services may also violate [Google's product policies](#), so before sending us a legal request, consider flagging the post, image, or video for one of our content teams to review. For more information on our product and privacy policies, our commitment to transparency, and how to submit a valid legal notice to Google, read on below.

The screenshot shows a vertical navigation menu with the following items, each with a chevron icon on the right:

- Finding support for your issue
- Protecting your information
- Transparency in our process
- Understanding copyright
- Submit a Legal Request

Below the menu, there is a text block for "Submit a Legal Request" which includes a link to a "tool" and a paragraph explaining the process of reporting content for removal. A second paragraph notes that multiple notices are required for multiple Google products.

Clicking the “tool” link provides removal of material from Google Groups; see screenshot:

## Removing Content From Google

This page will help you get to the right place to report content that you would like removed from Google's services under applicable laws. Providing us with complete information will help us investigate your inquiry.

If you have non-legal issues that concern Google's [Terms of Service](#) or Product Policies, please visit <http://support.google.com>

We ask that you submit a separate notice for each Google service where the content appears.

The screenshot shows a selection screen with the heading "What Google product does your request relate to?" and a link to "See more products". Below this is a list of Google products with radio buttons next to each:

- App Engine & Compute Engine
- Chrome Web Store/Extensions Gallery
- Glassware
- Gmail
- Google AMP Cache
- Google Cloud Storage & Cloud Bigtable
- Google Code
- Google Domains
- Google Fiber
- Google Groups** (highlighted in yellow)
- Google News




Clicking the “Google Groups” option provides for submitting a removal request for any of the following reasons; see screenshot:


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We ask that you submit a separate notice for each Google service where the content appears.

What Google product does your request relate to? [See more products](#) 

Select from the following list [Google Groups](#) 

Please note that a copy of each legal notice we receive may be sent to the Lumen project ( <http://www.lumendatabase.org> ) for publication and annotation. **Lumen will redact the submitter's personal contact information (i.e. phone number, e-mail and address).**

You can see an example of such a publication at <https://www.lumendatabase.org/notices/5838>

We may also send the original notice to the alleged infringer or, if we have reason to suspect the validity of your complaint, to the rights holder.

We may also publish similar information from your notice to our Transparency Report. You may find out more information about the Report [here](#).

What can we help you with?

- I have found content that may violate my copyright
- I would like to file a counter notice to reinstate content that was removed due to an alleged copyright violation
- I have a court order declaring certain content unlawful (e.g., pursuant to a copyright or trademark infringement suit)
- I would like to report the sale or promotion for sale of counterfeit goods
- Other issue that involves content removal

On June 8, 2015 I submitted a request to Google using the tool. Google replied on June 16, as follows:

Hello,

Thanks for reaching out to us.

We confirm receipt of your removal request and the attached document that you provided us. It remains unclear to us how the material specified in your removal request relates to the legal document that you attached to your previous correspondence. While we attempt to comply with all valid legal process, we are unable to take any further action on your complaint unless you can demonstrate to us exactly where the removal of the content in question is specified in the document you attached, or you can provide additional documentation from the court confirming that the URLs mentioned in your complaint are the ones the court has found to be unlawful.

Regards,  
The Google Team

On June 16<sup>th</sup> I responded:

Thank you for your attention so far.

The specific language demanding removal can be found in the Joint Stipulation (Docket 33) section (5)(b) which states:

"SMITH will remove any online commentary regarding PARIS authored by SMITH on any other website, social network, or any other manner of technology or communication now known or later to become known."  
The Court ordered compliance with the Joint Stipulation under Docket 35 ("Order on Joint Stipulation") signed by Judge Kovachevich.

The Joint Stipulation did not list specific URLs because they were found to be too numerous to list individually. The URLs provided to you were all authored by Smith, under his own name. Marc Smith has indicated he does not know how to remove the posts, and is of advanced age, so this may be beyond his ability. Thus I am providing these court documents to you directly.

Thank you.

Christopher Paris

On June 20th, Google responded:

Hello,

Thanks for reaching out to us.

For Google Groups, you must identify the URL of each specific post that contains the allegedly infringing material. Please follow these instructions:

- 1) Click on the downwards arrow in the upper right-hand corner of the post (this arrow will be next to "Reply" button)
- 2) Click on "Link" - a dialogue box containing the post URL will appear
- 3) Copy and submit this post URL

Regards,  
The Google Team

On July 14<sup>th</sup>, a list of URLs was entered into the form as directed by Google. On August 18<sup>th</sup>, Google responded with a request that made it clear only a court order listing the URLs would be acceptable.

Hello,

Thanks for reaching out to us.

We confirm receipt of your removal request and the attached document that you provided us. It remains unclear to us how the material specified in your removal request relates to the legal document that you attached to your previous correspondence. While we attempt to comply with all valid legal process, we are unable to take any further action on your complaint unless you can demonstrate to us exactly where the removal of the content in question is specified in the document you attached, or you can provide additional documentation from the court confirming that the URLs mentioned in your complaint are the ones the court has found to be unlawful.

Regards,  
The Google Team

This response came after the mediated settlement on June 5<sup>th</sup>, making the need for a "letter" signed by Smith moot.