

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

KELLY HYMAN and
BOUGANVILLA INVESTMENTS INC.,

Case No. 12-44972-CA-01

Plaintiff,

vs.

ARNOLD DAOUD,

Defendant.

_____ /

**NON-PARTY EUGENE VOLOKH'S MOTION TO
INTERVENE AND FOR RECONSIDERATION OF ORDER**

Non-Party Eugene Volokh respectfully moves this Court for leave to intervene in this action for the limited purpose of challenging this Court's *Order on Plaintiff, Kelly Hyman's, Motion to Correct Clerical Error in Judgment or Order* dated March 13, 2024 (the "Corrected Order"), as it applies to Volokh, and for reconsideration of that same Order. This Motion is made pursuant to Fla. R. Civ. P. 1.230 and 1.540.

1.0 Introduction

Eugene Volokh is the Thomas M. Siebel Senior Fellow at the Hoover Institution at Stanford University, and the Gary T. Schwartz Distinguished Professor of Law Emeritus at UCLA School of Law. He is the founder and coauthor of *The Volokh Conspiracy*, a blog that is hosted by Reason Magazine; he routinely writes about various legal matters, including orders aimed at getting material removed from the Internet. Volokh is not a party to this dispute, and the underlying claims in this action do not involve him or his conduct. Still, the Parties have chosen to rope him into this case in an attempt to clean up the Plaintiff's online presence by making misrepresentations to this Court and by attempting to violate his Constitutional rights. Unfortunately, this Court appears to have ratified this overture, seemingly ordering some of Volokh's publications to be scrubbed from the internet without notice, hearing, or due process.

Volokh now brings this Motion asking the Court to correct this by expunging the infirm Order so that his rights, and the rights of the other individuals and media organizations targeted by the Order, may be restored.

2.0 Factual Background

2.1 The Underlying Matter and Agreed Order

This action stems from a dispute filed in 2012. At some point, a settlement agreement was entered into between the parties which involved an agreement by the Defendant to remove certain postings he had personally made online about the Plaintiff. *See* Agreed Order to Take Down Internet Posting Related to Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman dated November 3, 2020, attached as **Exhibit 1** (the “Agreed Order”). That Agreed Order implemented this agreement and targeted a number of websites and links which, apparently, were either authored by the Defendant or published at his direction. *See id.*

But rather than limiting itself to publications which the parties agreed to take down, or which the Court determined were unlawful, the original Order, as submitted to the Court by the Parties, purported to force “any internet-related services, internet service provider, host provider and/or search engine” to remove from any website:¹

all statements, posts, social media, or videos or documents *related to directly or indirectly* to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, *or any statements against* Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman *on the internet, television, radio, print or any other forms of media* including, but not limited to the Sites.

See Agreed Order at pg. 5, § i (emphasis added). It further requires that “any derogatory references” and “any derogatory and/or negative comment,” about Kelly Hyman be removed from any website. *See id.* at § ii. The Order additionally required the removal of any “derogatory

¹ At first blush, it might appear that these requirements only apply to the websites referenced by specific URL. However, the Agreed Order specifies that it “shall apply to, but not be limited to,” the listed URLs. *See* Agreed Order at 2. The Order further specifies that “any internet-related services, internet service provider, host provider and/or search engine” must abide the Order. *See id.* at 4-5. And, many of these requirements apply broadly to “any website.” *See id.* at 5.

reference,” “judicial complaint[,] and/or any derogatory comment,” concerning Paul G. Hyman, Jr. *See id* at § iii. Finally, the Agreed Order required the removal of anything written whatsoever about the lawsuit, and even required that the Order itself not be published online. *See id* at § iv & pgs. 5-6.

2.2 Volokh’s Writings on the Agreed Order

Noting the broad nature of the Agreed Order, and its dubious constitutionality, Volokh first wrote an article about the lawsuit and the Order on November 24, 2020. *See* Eugene Volokh, “Overbroad Injunction Used to Try to Vanish Articles About Daughter’s Property Lawsuit Against Father,” REASON (Nov. 24, 2020) (the “First Article”), attached as **Exhibit 2**.² As journalists ordinarily do, Volokh reached out to Plaintiff’s counsel for comment, but received only a response saying that his email address was being blocked. *See* Eugene Volokh, “An Odd Response from One of the Lawyers in the Kelly Hyman v. Alex Daoud Case,” REASON (Nov. 24, 2020) (the “Second Article”), attached as **Exhibit 3**.³

A few months later, Volokh again wrote about the case after he had received a notice from Google indicated that it had received a request to de-index the First Article from its search engine. *See* Eugene Volokh, “Attempt to Vanish My Article About Attempt to Vanish Other Articles,” REASON (Feb. 19, 2021) (the “Third Article”), attached as **Exhibit 4**;⁴ *see also* “Defamation Complaint to Google,” Lumen Database (Feb. 16, 2021), attached as **Exhibit 5**.⁵ And, most recently, Volokh wrote about a second attempt to de-index his First and Third Articles from Google. *See* Eugene Volokh, “Attempt to Vanish My Article About Attempt to Vanish My Article About Attempt to Vanish Other Articles,” REASON (Dec. 13, 2023) (the “Fourth Article”), attached

² Available at: <https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/> (last accessed Oct. 25, 2024).

³ Available at: <https://reason.com/volokh/2020/11/24/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case/> (last accessed Oct. 23, 2024).

⁴ Available at: <https://reason.com/volokh/2021/02/19/attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/> (last accessed Oct. 23, 2024).

⁵ Available at: https://lumendatabase.org/notices/23041037?access_token=VQ0-rib9trSyUwdBkJFANQ (last accessed Oct. 23, 2024).

as **Exhibit 6**;⁶ *see also* “Court Order Complaint to Google,” Lumen Database (Dec. 9, 2023), attached as **Exhibit 7**.⁷

2.3 The Motion to Correct and Corrected Order

Thereafter on January 24, 2024, Plaintiff filed in this action a motion seeking to amend the prior Agreed Order to include additional webpages to be scrubbed from the internet. *See* Plaintiff, Kelly Hyman’s, Motion to Correct Clerical Error in Judgment or Order (the “Motion to Correct”), attached as **Exhibit 8**. The Motion argued that although the Parties’ intention was for the Agreed Order to take down all disparaging information published by the Defendant relating to the Plaintiff, but that the links cited in the Motion to Correct “were omitted by mistake,” from that Order. Plaintiff continued to argue in the Motion that the “omission” at issue was an “errors or mistakes arising from an accidental slip or omission, not errors or mistakes in the substance of what is decided by the judgment or order.” *See* Motion to Correct at ¶ 7, citing *Moforis v. Moforis*, 977 So.2d 786 (Fla. 4th DCA 2008).

On March 13, 2024, the Court entered an Order granting the Motion to Correct and requiring “the taking down or deletion or deindexing” of the URLs listed in the Motion, including, inter alia, Volokh’s First, Second, Third, and Fourth Articles, a link to a Third DCA decision stemming from this matter, news articles from CBS News, the Daily Mail, Miami Herald, Law.com, and even a Tweet posted by Volokh. *See* Corrected Order, attached as **Exhibit 9**, at ¶ 1. The Corrected Order then reiterated some of the other broad takedown requirements set forth in the Agreed Order, including as it relates to any articles or webpages related to the lawsuit, or any derogatory references to Kelly Hyman or Paul G. Hyman, Jr. *See* Corrected Order at ¶ 2.

⁶ Available at: <https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/> (last accessed Oct. 23, 2024).

⁷ Available at: https://lumendatabase.org/notices/38039676?access_token=pQ-s2HSkpBoZRzqmepVo8w (last accessed Oct. 23, 2024).

2.4 Further Attempts to Take Down Volokh's Writings

On October 17, 2024, well after the Corrected Order was entered, Volokh received an email from an individual purporting to be Plaintiff's agent demanding that, pursuant to the Corrected Order, Volokh must remove his Second and Fourth Articles. *See* Email from Angelina Wood dated Oct. 17, 2024, attached as **Exhibit 10**.

3.0 Legal Standard

An interested non-party "may at any time be permitted to assert a right by intervention..." Fla. R. Civ. P. 1.230. Further, a court may alter or terminate a prior order if it is shown that the order is invalid, or if the order was obtained by fraud, misrepresentation, or other misconduct of an adverse party. Fla. R. Civ. P. 1.540.

4.0 Argument

This Court's Corrected Order is unconstitutional and works to deprive Volokh of his rights under the United States Constitution. Accordingly, Volokh has an interest which allows him to intervene in this case for the purpose of seeking the termination of those orders.

4.1 Leave to Intervene Should Be Granted

Because the Corrected Order directly implicates Volokh's rights, and directly implicates Volokh's writings, he has a sufficient interest to intervene. Deciding whether to grant intervention involves two steps: first, the Court must decide "that the interest asserted is appropriate to support intervention," and second, the Court "must determine the parameters of the intervention." *Lexington Ins. Co. v. James*, 295 So. 3d 367, 371 (Fla. 1st DCA 2020), quoting *Union Cent. Life Ins. Co. v. Carlisle*, 593 So. 2d 505, 507-08 (Fla. 1992). Intervention is proper where a non-party has an interest in the matter being litigated which is "of such a direct and immediate character that the intervenor will either gain or lose by the direct legal operation and effect of the judgment." *Omni Nat'l Bank v. Georgia Banking Co.*, 951 So. 2d 1006, 1007 (Fla. 3d DCA 2007).

Here, intervention is proper. Although Volokh is not a party to this case, the Corrected Order purports to directly affect the publication of his writings—four separate articles he wrote and published online for a well-known media outlet. The Corrected Order specifically references

those articles by link and URL and purports to require any internet service provider receiving notice of the order to take down the articles, and to remove any link to the articles, within 10 days.

This sort of “direct and immediate” impact on Volokh’s writings, and thus Volokh’s rights under the First and Fourteenth Amendments, are the sort that require leave to intervene. In *Midnight Express Power Boats, Inc. v. Aguilar*, the Third DCA considered whether a trial court erred when it denied an employer’s intervention in a case where a former employer sought to enjoin a former employee from working for the new employer based upon a non-compete agreement. 390 So. 3d 128 (Fla. 3d DCA 2024). In reaching its decision reversing the trial court, the Third DCA found that the new employer had standing to intervene because the injunction would have affected its rights to employ the individual, and because the new employer’s due process rights were implicated by the former employer’s request that the injunction bind the new employer. *See id.* at 131. Because Volokh’s rights are directly implicated by the Corrected Order, intervention is proper.

Finally, Volokh only requests limited intervention here. He does not wish to litigate on behalf of any party other than himself, and he does not seek to challenge the Corrected Order beyond the degree to which it affects his own rights. Accordingly, such limited intervention is proper.

4.2 The Court Should Terminate the Corrected Order

The Court must terminate the Corrected Order because it is invalid and because it was obtained by misrepresentation.

4.2.1 The Order is Invalid

Despite the injunctive language in the Corrected Order, Volokh is not, and cannot be, bound by it. Moreover, because Volokh did not receive notice or an opportunity to be heard before entry of the Corrected Order, and because the Corrected Order violates the First Amendment, the Corrected Order is invalid.

As a preliminary matter, the Corrected Order does not bind Volokh because he is not a party, and he is not working with or on behalf of any party. Under Fla. R. Civ. P. 1.610(c), the

Corrected Order is “binding on the parties to the action, their officers, agents, servants, employees, and attorneys and on those persons in active concert or participation with them.” Fla. R. Civ. P. 1.610(c). Volokh falls into none of these categories. He is entirely unconnected to Hyman or Daoud, except to the extent that he has written about their litigation. Just as with the injunction in *Spagnuolo v. Ins. Office of Am., Inc.*, 356 So. 3d 908 (Fla. 5th DCA 2023), “to the extent that” the injunction “purports to enjoin anybody other than” the parties, it must be “quashed because the trial court has no jurisdiction over non-parties.” *Id.* at 920. “A court is without jurisdiction to issue an injunction which would interfere with the rights of those who are not parties to the action. An injunction can lie only when its scope is limited in effect to the rights of parties before the court.” *Two Islands Dev. Corp. v. Clarke*, 157 So. 3d 1081, 1083-84 (Fla. 3d DCA 2015), quoting *Sheoah Highlands, Inc. v. Daugherty*, 837 So.2d 579, 583 (Fla. 5th DCA 2003). Moreover, before an injunction may apply to a non-party, that non-party must be given notice and an opportunity to be heard. *See Midnight Express Power Boats*, 390 So. 3d at 132, citing *Leighton v. First Universal Lending, LLC*, 925 So.2d 462, 465 (Fla. 4th DCA 2006). Volokh is not, and cannot be, bound by the Court’s injunction, and the injunction is invalid to the extent it purports to require Volokh to take down his writings.

Even though the Corrected Order does not bind Volokh, to the extent any Party argues it does, the Order is invalid because it violates Volokh’s right to due process. Nonparties to a lawsuit, who received “neither notice of, nor sufficient representation in” the proceedings, cannot be bound by the court’s decision “as a matter of federal due process.” *Richards v. Jefferson County, Ala.*, 517 U.S. 793, 805 (1996). “Due process requires notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.” *United Student Aid Funds, Inc. v. Espinosa*, 559 U.S. 260, 272 (2010) (cleaned up).

Thus, even when “consistent with Florida Rule of Civil Procedure 1.610(c), an injunction may bind a non-party,” nonetheless “even a non-party with notice of the injunction cannot be bound without having an opportunity to be heard.” *Midnight Express Power Boats*, 390 So. 3d at

132.⁸ Even when “a court can enjoin” particular people, “those parties must receive notice and have an opportunity to be heard”; someone who “was neither named in the claim for injunctive relief nor served” is not constrained by an injunction, because “[a]n injunction cannot bind parties who are not before the court.” *Leighton*, 925 So.2d at 465. Accordingly, this Court may not enforce the Corrected Order against Volokh because he was not afforded any due process.

Finally, the Corrected Order, as it applies to Volokh, violates the First Amendment. As a preliminary matter, Volokh’s posts are protected by the First Amendment. They consist entirely of statements from public records (such as past orders of this court), other accurate factual assertions, and statements of opinion. They have never been found to fit within any First Amendment exception, such as for true threats of violence, or for libel—nor could they be so found. A court therefore may not order that Volokh remove them. *See, e.g., Krapacs v. Bacchus*, 301 So. 3d 976, 980-81 (Fla. 4th Dist. 2020) (citing cases).

The Corrected Order also violates the First Amendment to the extent it prohibits “[t]his order along with any court documents related directly or indirectly to this matter” from being published on “any website, and/or social media and/or internet.” *See* Corrected Order at ¶ 4. The republication of judicial documents is itself protected under the First Amendment. *See, e.g., Florida Star v. B.J.F.*, 491 U.S. 524, 538 (1989) (cleaned up) (“Once the government has placed ... information [about a person] in the public domain, reliance must rest upon the judgment of those who decide what to publish.”); *Cox Broad. Corp. v. Cohn*, 420 U.S. 469, 496-97 (1975) (where “true information is disclosed in public court documents open to public inspection, the press cannot be sanctioned for publishing it”).¹⁰ Volokh has published court filings from this action

⁸ These due process principles apply more strongly to restrictions on speech that were issued without notice to the speakers: In *Carroll v. President & Comm’rs of Princess Anne*, the Supreme Court held that even a “10-day restraining order ..., issued *ex parte*, without formal or informal notice to the petitioners or any effort to advise them of the proceeding, cannot be sustained.” 393 U.S. 175, 181 (1968).

¹⁰ This right applies equally to media and non-media parties. *See Nodar v. Galbreath*, 462 So. 2d 803, 808 (Fla. 1984) (“[T]he constitutionally protected right to discuss, comment upon, criticize, and debate, indeed, the freedom to speak on any and all matters is extended not only to

in the past, and he intends to continue doing so in connection with his writing. His ability to publish these documents is protected by the First Amendment, and to the extent the Corrected Order purports to restrict this right, the Order is invalid.

The Corrected Order does not apply to Volokh, and to the extent the Parties assert it does, the Order is invalid. Accordingly, it must be terminated.

4.2.2 The Order Was Obtained Through Misrepresentation

Even beyond the legal infirmities contained within the Corrected Order, it must be terminated because it was obtained through fraud and misrepresentation. Under Fla. R. Civ. P. 1.540(b)(3), a court may relieve a party from an order based upon “fraud..., misrepresentation, or other misconduct of an adverse party.” Here, Plaintiff’s Motion to Correct, upon which the Corrected Order is premised, contains materially false statements and other misrepresentations which warrant termination of the Corrected Order.

As discussed *supra*, Plaintiff’s Motion to Correct argued that correcting the order was necessary because the new links the Motion cited “were omitted by mistake” from that Order, and because the “omission” at issue was an “errors or mistakes arising from an accidental slip or omission, not errors or mistakes in the substance of what is decided by the judgment or order.” *See* Motion to Correct at ¶ 7. This characterization, however, is inaccurate. The Agreed Order, which the Motion to Correct sought to “correct,” was entered on November 3, 2020. All of Volokh’s writings which were linked to in the Motion to Correct, and which were ultimately included in the Corrected Order, were written **after** the Agreed Order was entered. It cannot be, then, that those articles were “omitted by mistake,” from the original order *if the articles were not yet written*.

These fraudulent misrepresentations are sufficient to warrant termination of the Corrected Order because the Court would not have granted the relief and would not have included the links to Volokh’s writings in the ultimate order, if Plaintiff had truthfully represented that the writings

the organized media but to all persons.”); *see also Citizens United v. FEC*, 558 U.S. 310, 352 (2010) (the Supreme Court has “consistently rejected the proposition that the institutional press has any constitutional privilege beyond that of other speakers.”)

were not actually subject to the Order, and in fact were authored and published *after* the Order had been entered. Moreover, Plaintiff’s attempt to justify the inclusion of Volokh’s writings in the Order would have been subject to heightened scrutiny by the Court if Plaintiff had accurately represented these facts to the Court. This type of fraud and misrepresentation is sufficient to warrant terminating the Corrected Order. *See, e.g., U.S. Bank Nat’l Ass’n v. Paiz*, 68 So. 3d 940, 943-44 (Fla. 3d DCA 2011).

5.0 Conclusion

In light of the foregoing, Volokh respectfully requests this Court to grant him leave to intervene in this case for the limited purpose of challenging the Corrected Order as it applies to him, and to terminate the Order based upon its violations of Volokh’s rights under the First and Fourteenth Amendments.

Dated: October 25, 2024.

Respectfully submitted,
/s/ Marc J. Randazza
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 Attorneys for Non-Party
 Eugene Volokh

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document has been furnished via the Florida Court E-Filing Portal on October 25, 2024, upon Counsel for Plaintiffs Kelly Hyman and Bouganvilla Investments, Inc., REID BURMAN LEBEDEKER XENICK PEPIN, Bernard A. Lebedeker, bal@reidburmanlaw.com, gmb@reidburmanlaw.com, Jeffrey C. Pepin, jcp@reidburmanlaw.com, 250 South Australian Ave., Ste. 602, West Palm Beach, FL 33401, BURSTEIN & ASSOCIATES, P.A., Bernardo Burstein, bburstein@bursteinpa.com, bursteinandassociates@gmail.com, and Counsel for Defendant Arnold Daoud, ZARCO EINHORN SALKOWSKI & BRITO, P.A., Alejandro Brito, One Biscayne Tower, 2 South Biscayne Boulevard, 34th Floor, Miami, Florida 33131, abrito@zarcolaw.com, apiriou@zarcolaw.com.

/s/ Marc J. Randazza
MARC J. RANDAZZA

EXHIBIT 1

Agreed Order to Take Down Internet Posting
Related to Kelly Hyman, Paul G. Hyman, Jr.,
Kaylee Hyman and Zachary Hyman
dated November 3, 2020

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO: 2012-044972-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

Hyman, Kelly

Plaintiff(s)

vs.

Daoud, Arnold

Defendant(s)

**AGREED ORDER TO TAKE DOWN INTERNET POSTING RELATED TO KELLY
HYMAN, PAUL G. HYMAN, JR., KAYLEE HYMAN AND ZACHARY HYMAN**

THIS CAUSE came before the Court on the settlement agreement of the parties and the Court's Order of August 21, 2020, and the Court being fully apprised in its premises, it is hereby

ORDERED AND ADJUDGED that within five (5) days of the date of entry of this Order, Defendant (Arnold A. Daoud), and those acting at his direction (hereinafter referred to as "Daoud") shall remove from the internet and from all social media and from any other place in which Daoud has posted or is responsible for posting or was posted at his direction any references to Kelly Hyman (aka Kelly Daoud aka Kelly Alexandra Hyman, aka Kelly Daoud Hyman aka Kelly Mohre) Paul G. Hyman, Jr., (aka Paul Hyman, aka Paul Hyman, Jr.) Kaylee Hyman (aka Kaylee Rose Hyman) and Zachary Hyman (aka Zachary Paul Hyman) (collectively referred to as "Hyman"), including without limitation, all text, websites, postings, photographs and videos.

ORDERED AND ADJUDGED that this order requires the taking down or deletion of any posting in private or public forum including, but not limited to websites, posts, videos,

comments, google ads, related to or mentioning Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman.

This Order shall apply to, but not be limited to, the following sites and/or internet addresses (collectively referred to as the “Sites”; individually referred to as “Site”):

www. atrociousattorney.com;

www.avariciousadultress.com

www.despicabledaughter.com;

www. shamefulproductions.com

www. phoneyhyman.com;

www. mayorsdaughter.com;

www. kelly.hyman.wtf;

www.tragicmess.com

<http://www.sinsofsouthbeach.com/news/id/25>

<https://www.shamefulproductions.com/the-shameful-past-of-attorney-kelly-hyman-a-timeline/>

<https://www.bitchute.com/video/n0HyDExsXeli/>

http://doSHARE.tips/kelly-hyman- eviction notice_57512e86b6d87f7fb08b4d49.html

<https://fraudonthecourt.blogspot.com/2007/10/complaint-against-judge-hyman.html>- and

the comment- Kellie Daoud said...

It seems like birds of a feather flock together. Judge Paul Hyman's wife, Attorney Kellie Hyman, is tied up in a nasty legal battle with her father, former Miami Beach Mayor Alex Daoud. She is trying to take away his house and evict him! Here is a website that details the whole tragic drama. It's a very good read! TragicMess.com

<https://twitter.com/despicdaughter>

https://twitter.com/DespicDaughter/with_replies

https://www.google.com/imgres?imgurl=https%3A%2F%2Fwww.despicabledaughter.com%2Fwp-content%2Fuploads%2F2015%2F01%2FKelly-Hyman-and-father-Alex-Daoud.png&imgrefurl=https%3A%2F%2Fwww.despicabledaughter.com%2Fauthor%2Falex%2Fpage%2F5%2F&tbnid=EUQgJmw5hVHZCM&vet=12ahUKEwjxcnn1_DqAhXOJc0KHQu9ACgQMygGegUIARCCAQ..i&docid=QGIRy7NDdFCXuM&w=1204&h=726&itg=1&q=kelly%20hyman%20and%20alex%20daoud&ved=2ahUKEwjxcnn1_DqAhXOJc0KHQu9ACgQMygGegUIARCCAQ

<https://www.google.com/url?sa=i&url=https%3A%2F%2Fwww.dailymotion.com%2Fvideo%2Fxo7o0ne4&psig=AOvVaw3KQV5xpbJmvor5B11aAGZn&ust=1596058666906000&source=images&cd=vfe&ved=0CDcQr4kDahcKEwjIiJKp9PDqAhUAAAAAHQAAAAAQAg>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Judge-Paul-G-Hyman-JR-FINAL-Ethics-Complaint.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Kelly-Hyman-excerpt-2013-12-5-Hearing.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Case-Attorney-Kelly-Hyman-v-Alex-Daoud.pdf>

<https://phoneyhyman.com/wp-content/uploads/2020/05/Attorney-Kelly-Hyman-Lost-Appeal-80x80.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1-394x218.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/sleepy-kelly-hyman-deposition-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1-394x218.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/sleepy-kelly-hyman-deposition-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/04/Kelly-Hyman-Statement-1024x555-1-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1.png>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Case-Attorney-Kelly-Hyman-v-Alex-Daoud.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Judge-Paul-G-Hyman-JR-FINAL-Ethics-Complaint.pdf>

<https://phoneyhyman.com/wp-content/uploads/2020/04/Kelly-Hyman-Statement-1024x555-1-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1.png>

<https://www.bing.com/images/search?view=detailV2&ccid=ZgvG3Zou&id=F6850262D4FF9993E98F3F68997C58B34A6592ED&thid=OIP.ZgvG3ZouQ80apTgrVWrZLgHaFj&mediaurl=https%3a%2f%2f.yimg.com%2fvi%2fQ1wSUN8VySU%2fhqdefault.jpg&exph=360&expw=480&q=kelly+hyman+and+phoneyhyman&simid=608017006876098833&ck=F3C3796672B6F7B881479060721488E8&selectedIndex=2&FORM=IRPRST&ajaxhist=0>

<https://www.despicabledaughter.com/wp-content/uploads/2015/01/Kelly-Hyman-Alex-Daoud-Alexander-Daoud.png>

<https://www.youtube.com/watch?v=Q1wSUN8VySU>

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host

provider and/or search engine shall

- i. remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, or any statements against Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman on the internet, television, radio, print or any other forms of media including, but not limited to the Sites.
- ii. remove and cause to be removed any derogatory references to Kelly Hyman including, but not limited to any reference to Hyman as an “adulteress,” “blackmailer,” “whore,” “despicable,” “liar,” and/or any derogatory and/or negative comment about Kelly Hyman.
- iii. remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as “prenup paul,” any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.
- iv. remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold “Alex” Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman or Zachary Hyman, which was or is created directly or indirectly by Daoud.

FURTHER ORDERED AND ADJUDGED that Daoud, directly or indirectly, shall not create any new alias, nor use any old alias, to post, host, or make available any statement regarding Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman via the internet, television, radio, print or any other forms of media.

FURTHER ORDERED AND ADJUDGED that this Order does not modify or

alter the settlement agreement of the parties or any prior order of this Court, and that the settlement agreement and all prior orders of this Court remain in full force and effect. This order along with any court documents related directly or indirectly to this matter is prohibited from being posted including, but not limited to any website, and/or social media and/or internet. This Court retains jurisdiction to enforce this order.

DONE AND ORDERED in Chambers in Miami-Dade County, Florida, on this __ day of November 2020.

Circuit Court Judge

cc: Counsel of record

DONE and ORDERED in Chambers at Miami-Dade County, Florida on this 3rd day of November, 2020.



2012-044972-CA-01 11-03-2020 5:58 PM

2012-044972-CA-01 11-03-2020 5:58 PM

Hon. Michael Hanzman

CIRCUIT COURT JUDGE

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

Electronically Served:

Alejandro Brito, abrito@zarcolaw.com

Alejandro Brito, apiriou@zarcolaw.com

Alejandro Brito, reception@zarcolaw.com
Bernard A Lebedeker, bal@reidburmanlaw.com
Bernard A Lebedeker, amn@reidburmanlaw.com
Bernardo Burstein, bburstein@bursteinpa.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bburstein@bursteinpa.com
Hon. (Ret.) Gill S. Freeman, gfreeman@jamsadr.com
John W. Salmon, martha@sd-adr.com
Lawrence D Silverman, lawrence.silverman@akerman.com
Lawrence D Silverman, wendy.gonzalez@akerman.com
Michael T Landen, mlanden@klugerkaplan.com
Michael T Landen, mmathis@klugerkaplan.com
Todd A. Levine, tlevine@klugerkaplan.com

Physically Served:

EXHIBIT 2

Eugene Volokh, “Overbroad Injunction Used to
Try to Vanish Articles About Daughter’s
Property Lawsuit Against Father,” REASON
(Nov. 24, 2020)



The Volokh Conspiracy

Mostly law professors | Sometimes contrarian | Often libertarian | Always independent

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FREE SPEECH

Overbroad Injunction Used to Try to Vanish Articles About Daughter's Property Lawsuit Against Father

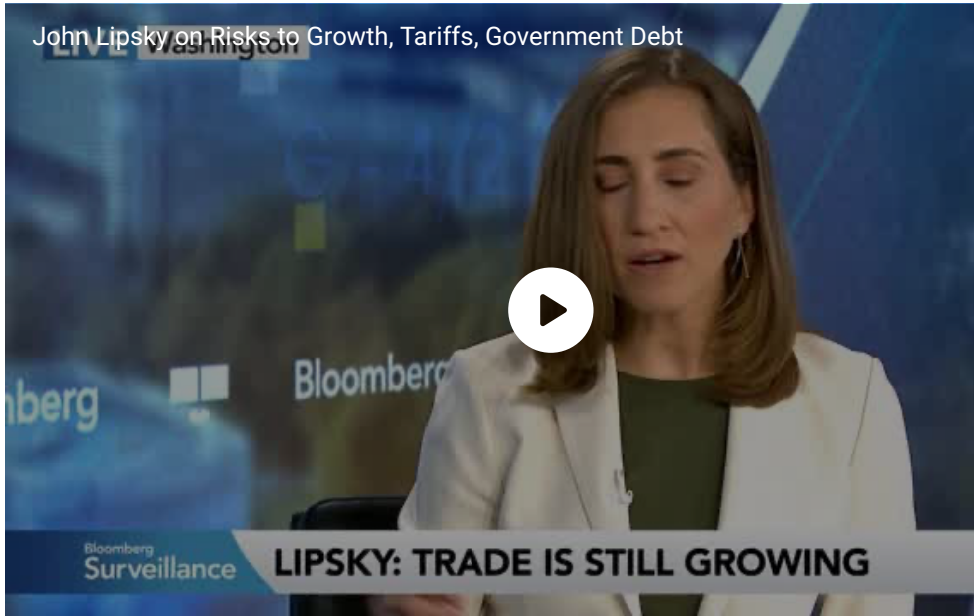
A court order, in *Kelly Hyman v. Alex Daoud*, on its face seems to command all Internet services to remove material that mentions the daughter (Kelly Hyman), or her husband (retired federal bankruptcy judge Paul Hyman).

EUGENE VOLOKH | 11.24.2020 10:22 AM

Alex Daoud had been mayor of Miami Beach from 1985 to 1991, but was then convicted of bribery and various other charges. Some years later, he arranged a real estate deal together with his daughter, Kelly Hyman (a lawyer and occasional political commentator)—but that went bad, and led her to sue him. The case dragged on for years, and unsurprisingly got a good deal of media coverage, such as in the Miami Herald, on the local CBS affiliate, and in the Real Deal (South Florida Real Estate News).

Hyman also alleged that Daoud or people working with him had posted various derogatory things about Hyman and her family (which includes her husband Paul Hyman, a retired federal bankruptcy judge), at sites named "atrociousattorney.com," "avariciousadulteress.com," "despicabledaughter.com," and the like. As a result, the parties entered into an Agreed Order to Take Down Internet Posting Related to Kelly Hyman, Paul G. Hyman, Jr., [and other family members], in which Daoud was ordered to remove such posts.

Advertisement



But here's the twist: After imposing the obligations on Daoud (who was a party to the agreement), the order went on to purport to bind third parties, who weren't parties (and to my knowledge weren't even notified that their rights were being adjudicated):

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host provider and/or search engine shall

remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or [the Hymans] and/or any website or posting defamatory, slander, or any statements against [the Hymans] ... including, but not limited to the Sites [listed earlier in the order].

remove and cause to be removed any derogatory references to Kelly Hyman including, but not limited to any reference to Hyman as an "adulteress," "blackmailer," "whore," "despicable," "liar," and/or any derogatory and/or negative comment about Kelly Hyman.

remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as "prenup paul," any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.

remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold "Alex" Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about [the Hymans], which was or is created directly or indirectly by Daoud.

And Google has indeed been asked, on the strength of this order, to deindex not just items that may have been posted by Daoud, but also mainstream media articles (see [here](#) and [here](#)):

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>
<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>
<https://miami.cbslocal.com/2014/06/27/notorious-father-faces- eviction-by-daughter/>
<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>
<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>
<https://www.law.com/dailybusinessreview/almID/1202676995842/Why-Judge-is-Dismayed-and-Disappointed-Over-1M-Fight-Between-Father-Daughter/>

And Google was also asked to deindex two items that criticize Judge Paul Hyman, which do not appear to be linked to Daoud, and which in any case consist of copies of documents filed in other matters:

<http://www.judgewatch.org/CJA-members/Gwynn/gwynn-exhibits%201-9.pdf>
<https://www.yumpu.com/es/document/view/13292106/judicial-complaint-against-judge-paul-g-hyman-by>

This appears to be the court's fully approving an order proposed by Ms. Hyman's lawyers.

I expect that Google will see through this, and will realize that it's not actually bound by the order (despite what the order says), because it had never been made a party to the case (and wasn't acting in concert with a party). And I expect that Google will also conclude that it shouldn't deindex the mainstream media pages (and the criticisms of Judge Hyman) even voluntarily, because there's no basis for thinking that there's anything false and defamatory there.

Still, I think the court erred in approving the overbroad agreed order, which on its face purports to bind entities that had never agreed to it. (I have e-mailed Kelly Hyman and her lawyers to get their side of the story, but haven't heard back from them.) [UPDATE: See here for an odd response I got from one of the lawyers after I put up this post.]

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Email *(Required)*

e.g. jane@example.com

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NEXT: Is It Individually Rational to Loosen Up Near the End of a Pandemic?

EUGENE VOLOKH is the Thomas M. Siebel Senior Fellow at the Hoover Institution at Stanford, and the Gary T. Schwartz Distinguished Professor of Law Emeritus and Distinguished Research Professor at UCLA School of Law. Naturally, his posts here (like the opinions of the other bloggers) are his own, and not endorsed by any institution.

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EXHIBIT 3

Eugene Volokh, “An Odd Response from One of the Lawyers in the Kelly Hyman v. Alex Daoud Case,” REASON (Nov. 24, 2020)



The Volokh Conspiracy

Mostly law professors | Sometimes contrarian | Often libertarian | Always independent

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CRIME

An Odd Response from One of the Lawyers in the *Kelly Hyman v. Alex Daoud Case*

EUGENE VOLOKH | 11.24.2020 4:39 PM

As I mentioned in my [post below](#), a Florida court issued an overbroad takedown order, which someone is using to try to vanish mainstream media articles about the *Hyman v. Daoud* daughter-vs.-father property lawsuit. (Kelly Hyman is a lawyer and an occasional political commentator; Alex Daoud, her father, is the former mayor of Miami Beach.) The overbroad order was apparently directly adapted from the [proposed order](#) submitted by Ms. Hyman's lawyers, Bernard Lebedeker and David Sholl.

I e-mailed the lawyers yesterday morning to ask whether they had a comment on the situation:

Dear Messrs. Lebedeker & Sholl: I'm writing an item about the Hyman v. Daoud deindexing order [which I attached to the e-mail -EV], and in particular its purporting to bind not just Mr. Daoud (who agreed to it) but search engines and other site operators (which didn't). I also noticed that Ms. Hyman (or someone working on her behalf) had apparently asked Google order – on the strength of this order order – to remove not just material that Mr. Daoud had posted, but also articles on the Miami Herald, CBS Miami, and The Real Deal sites, as well as some criticisms of Judge Paul Hyman that don't seem to come from Mr. Daoud. See https://lumendatabase.org/notices/22289871?access_token=PmqJlvB2uV55U65_hZwOt6A and https://lumendatabase.org/notices/22299229?access_token=akdiWrDzTNNkECqFuJpDzA . Can you tell me a bit more, please, about the thinking behind the attempt to bind nonconsenting third parties, and to remove legitimate news coverage of the dispute? Please let me know. (I'm asking you given that the order was proposed as an attachment to your Oct. 30, 2020 motion.) Many thanks,

Eugene Volokh

Author, Reason Magazine site, <https://reason.com/volokh> Professor of Law, UCLA School of Law, <http://www.law.ucla.edu/volokh>

Here's a response I got this afternoon from Mr. Lebedeker:

I'm sorry, I don't know who you are or why you are sending this. I am placing you on my block sender's list, please do not contact me again.

Bernard A. Lebedeker, Esq.

Well, all right then, though I'm not sure how I could have been clearer about who I was and why I was sending my message.

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Email *(Required)*

e.g. jane@example.com

Submit

NEXT: Audio of my Recent Federalist Society Teleforum on the Supreme Court Oral Argument in California v. Texas - the Obamacare "Severability" Case

EUGENE VOLOKH is the Thomas M. Siebel Senior Fellow at the Hoover Institution at Stanford, and the Gary T. Schwartz Distinguished Professor of Law Emeritus and Distinguished Research Professor at UCLA School of Law. Naturally, his posts here (like the opinions of the other bloggers) are his own, and not endorsed by any institution.

CRIME



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EXHIBIT 4

Eugene Volokh, “Attempt to Vanish My Article
About Attempt to Vanish Other Articles,”
REASON (Feb. 19, 2021)



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FREE SPEECH

Attempt to Vanish My Article About Attempt to Vanish Other Articles

My article was about *Kelly Hyman v. Alex Daoud*, in which a court order seemed to command all Internet "services" to remove material that mentions plaintiff or her husband (retired federal bankruptcy judge Paul Hyman).

EUGENE VOLOKH | 2.19.2021 11:11 AM

I wrote about *Hyman v. Daoud* in November (reproduced below), but three days ago Google got the following takedown request from someone:

Re: Unknown

NOTICE TYPE: Defamation

Legal Complaint: Google provided this person with my confidential court order....

URLS OF ALLEGEDLY DEFAMATORY MATERIAL:

<https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>

The order I wrote about was attached to the request. There was no indication, though, of what was supposedly defamatory about what I wrote; and though the request claims the court order is confidential, that's not true: I just confirmed that the order is available on the [Miami-Dade County court records site](#) (search for local case number 2012-044972-CA-01 and go to docket number 38). [UPDATE: Just to be clear, based on my research on how Google deals with such matters, I very much doubt that Google will actually deindex my article based on this request.]

I e-mailed Ms. Hyman to ask her for some more explanation for what was thought to be defamatory or confidential here. I can't be sure that she was the one who submitted this request, directly or through an agent, but she would seem to be the likely beneficiary; and in December she had e-mailed me to ask me to remove my post, though I said no to that request. I have not heard back from her, but if I do, I will post an update.

Here's the original post:

Alex Daoud had been mayor of Miami Beach from 1985 to 1991, but was then convicted of bribery and various other charges. Some years later, he arranged a real estate deal together with his daughter, Kelly Hyman (a lawyer and occasional political commentator)—but that went bad, and led her to sue him. The case dragged on for years, and unsurprisingly got a good deal of media coverage, such as in the Miami Herald, on the local CBS affiliate, and in the Real Deal (South Florida Real Estate News).

Hyman also alleged that Daoud or people working with him had posted various derogatory things about Hyman and her family (which includes her husband Paul Hyman, a retired federal bankruptcy judge), at sites named "atrociousattorney.com," "avariciousadulteress.com," "despicabledaughter.com," and the like. As a result, the parties entered into an Agreed Order to Take Down Internet Posting Related to Kelly Hyman, Paul G. Hyman, Jr., [and other family members], in which Daoud was ordered to remove such posts.

So far, that's fine; parties are generally entitled to enter into such agreements. But here's the twist: After imposing the obligations on Daoud (who was a party to the agreement), the order went on to purport to bind third parties, who weren't parties (and to my knowledge weren't even notified that their rights were being adjudicated):

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[Judge Throws Out Charges Against Arizona Mom Arrested for Criticizing Officials at a City Council Meeting](#)

C.J. CIARAMELLA | 10.25.2024 12:27 PM

[How To Avoid Paying Tariffs? Have a Friend in Washington.](#)

ERIC BOEHM | 10.25.2024 12:00 PM

[Iowa Supreme Court is Considering if the State Can Charge Acquitted Defendants for Court-Appointed Attorneys](#)

C.J. CIARAMELLA | 10.25.2024 11:08 AM

[Venom: The Last Dance Is a Camp Buddy Comedy Disguised as a Comic Book Movie](#)

PETER SUDERMAN | 10.25.2024 10:31 AM

[To Get Through This Election, Eat Some Ethiopian Food](#)

BILLY BINION | 10.25.2024 10:15 AM

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host provider and/or search engine shall

remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or [the Hymans] and/or any website or posting defamatory, slander, or any statements against [the Hymans] ... including, but not limited to the Sites [listed earlier in the order].

remove and cause to be removed any derogatory references to Kelly Hyman including, but not limited to any reference to Hyman as an "adulteress," "blackmailer," "whore," "despicable," "liar," and/or any derogatory and/or negative comment about Kelly Hyman.

remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as "prenup paul," any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.

remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold "Alex" Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about [the Hymans], which was or is created directly or indirectly by Daoud.

And Google has indeed been asked, on the strength of this order, to deindex not just items that may have been posted by Daoud, but also mainstream media articles (see [here](#) and [here](#)):

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>
<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>
<https://miami.cbslocal.com/2014/06/27/notorious-father-faces-eviction-by-daughter/>
<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>
<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>
<https://www.law.com/dailybusinessreview/almID/1202676995842/Why-Judge-is-Dismayed-and-Disappointed-Over-1M-Fight-Between-Father-Daughter/>

And Google was also asked to deindex two items that criticize Judge Paul Hyman, which do not appear to be linked to Daoud, and which in any case consist of copies of documents filed in other matters:

<http://www.judgewatch.org/CJA-members/Gwynn/gwynn-exhibits%201-9.pdf>
<https://www.yumpu.com/es/document/view/13292106/judicial-complaint-against-judge-paul-g-hyman-by>

This appears to be the court's fully approving an order proposed by Ms. Hyman's lawyers.

I expect that Google will see through this, and will realize that it's not actually bound by the order (despite what the order says), because it had never been made a party to the case (and wasn't acting in concert with a party). And I expect that Google will also conclude that it shouldn't deindex the mainstream media pages (and the criticisms of Judge Hyman) even voluntarily, because there's no basis for thinking that there's anything false and defamatory there.

Still, I think the court erred in approving the overbroad agreed order, which on its face purports to bind entities that had never agreed to it. (I have e-mailed Kelly Hyman and her lawyers to get their side of the story, but haven't heard back from them.) [UPDATE: See here for an odd response I got from one of the lawyers after I put up this post.]

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NEXT: More Criminalization: “Harassment” and Stop-Talking-About- Plaintiff Injunctions

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EXHIBIT 5

“Defamation Complaint to Google,” Lumen
Database (Feb. 16, 2021)



Search

Topics

Research and Media Mentions

About

Search all notices...

Go

Exact search

Defamation Complaint to Google

SENDER

[REDACTED]

[Private]

US

Sent on February 16, 2021

COUNTRY: US



RECIPIENT

Google LLC

[Private]

Mountain View, CA, 94043, US

SUBMITTER

Google LLC

Re: Unknown

NOTICE TYPE: Defamation

Legal Complaint

Google provided this person with my confidential court order.

URLS OF ALLEGEDLY DEFAMATORY MATERIAL:

- 01. <https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>

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EXHIBIT 6

Eugene Volokh, “Attempt to Vanish My Article
About Attempt to Vanish My Article About
Attempt to Vanish Other Articles,” REASON
(Dec. 13, 2023)



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FREE SPEECH

Attempt to Vanish My Article About Attempt to Vanish My Article About Attempt to Vanish Other Articles

EUGENE VOLOKH | 12.14.2023 11:29 AM

I wrote about *Hyman v. Daoud*, a case that sought the takedown of various online items—including mainstream media articles—in November 2020. I then wrote in 2021 about an attempt to get Google to deindex my article (among others), aimed at causing it to disappear from search results. And four days ago Google got the following takedown request from someone, seeking to deindex my 2020 and 2021 articles, plus various other media articles:

Re: Unknown

NOTICE TYPE: Court Order

Explanation of Court Order

Pursuant to the confidential , court order, which states the following:

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host provider and/or search engine shall remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, or any statements against Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman on the internet, television, radio, print or any other forms of media including, but not limited to the Sites ...

TARGETED URLS:

1. <http://conlinpa.com/2016/04/03/hyman-v-daoud/>
2. <https://beforeitsnews.com/libertarian/2020/11/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case-2763652.html>
3. <https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>
4. <https://reason.com/volokh/2021/02/19/attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>
5. <https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>
6. <https://www.cbsnews.com/miami/news/notorious-father-faces-eviction-by-daughter/>
7. <https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>
8. <https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

The order I wrote about was attached to the request. Though the request claims the court order is confidential, that's not true: I just confirmed that the order is available on the [Miami-Dade County court records site](https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html) (search for

LATEST

local case number 2012-044972-CA-01 and go to docket number 38). Based on my research on how Google deals with such matters, I very much doubt that Google will actually deindex my articles based on this request.

I e-mailed Ms. Hyman to ask her for some more explanation for what was thought to be defamatory or confidential here. I can't be sure that she was the one who submitted this request, directly or through an agent, but she would seem to be the likely beneficiary; and in 2020 she had e-mailed me to ask me to remove my post, though I said no to that request. I have not heard back from her, but if I do, I will post an update.

Here's the original post:

[* * *]

Alex Daoud had been mayor of Miami Beach from 1985 to 1991, but was then convicted of bribery and various other charges. Some years later, he arranged a real estate deal together with his daughter, Kelly Hyman (a lawyer and occasional political commentator)—but that went bad, and led her to sue him. The case dragged on for years, and unsurprisingly got a good deal of media coverage, such as in the Miami Herald, on the local CBS affiliate, and in the Real Deal (South Florida Real Estate News).

Hyman also alleged that Daoud or people working with him had posted various derogatory things about Hyman and her family (which includes her husband Paul Hyman, a retired federal bankruptcy judge), at sites named "atrociousattorney.com," "avariciousadulteress.com," "despicabledaughter.com," and the like. As a result, the parties entered into an Agreed Order to Take Down Internet Posting Related to Kelly Hyman, Paul G. Hyman, Jr., [and other family members], in which Daoud was ordered to remove such posts.

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Judge Throws Out Charges Against Arizona Mom Arrested for Criticizing Officials at a City Council Meeting

C.J. CIARAMELLA | 10.25.2024 12:27 PM

How To Avoid Paying Tariffs? Have a Friend in Washington.

ERIC BOEHM | 10.25.2024 12:00 PM

Iowa Supreme Court is Considering if the State Can Charge Acquitted Defendants for Court-Appointed Attorneys

C.J. CIARAMELLA | 10.25.2024 11:08 AM

Venom: The Last Dance Is a Camp Buddy Comedy Disguised as a Comic Book Movie

PETER SUDERMAN | 10.25.2024 10:31 AM

To Get Through This Election, Eat Some Ethiopian Food

BILLY BINION | 10.25.2024 10:15 AM

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host provider and/or search engine shall

i. remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or [the Hymans] and/or any website or posting defamatory, slander, or any statements against [the Hymans] ... including, but not limited to the Sites [listed earlier in the order].

ii. remove and cause to be removed any derogatory references to Kelly Hyman including, but not limited to any reference to Hyman as an "adulteress," "blackmailer," "whore," "despicable," "liar," and/or any derogatory and/or negative comment about Kelly Hyman.

iii. remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as "prenup paul," any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.

iv. remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold "Alex" Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about [the Hymans], which was or is created directly or indirectly by Daoud.

And Google has indeed been asked, on the strength of this order, to deindex not just items that may have been posted by Daoud, but also mainstream media articles (see [here](#) and [here](#)):

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>
<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>
<https://miami.cbslocal.com/2014/06/27/notorious-father-faces-eviction-by-daughter/>
<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>
<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>
<https://www.law.com/dailybusinessreview/almID/1202676995842/Why-Judge-is-Dismayed-and-Disappointed-Over-1M-Fight-Between-Father-Daughter/>

And Google was also asked to deindex two items that criticize Judge Paul Hyman, which do not appear to be linked to Daoud, and which in any case consist of copies of documents filed in other matters:

<http://www.judgewatch.org/CJA-members/Gwynn/gwynn-exhibits%201-9.pdf>
<https://www.yumpu.com/es/document/view/13292106/judicial-complaint-against-judge-paul-g-hyman-by>

This appears to be the court's fully approving an order proposed by Ms. Hyman's lawyers.

I expect that Google will see through this, and will realize that it's not actually bound by the order (despite what the order says), because it had never been made a party to the case (and wasn't acting in concert with a party). And I expect that Google will also conclude that it shouldn't deindex the mainstream media pages (and the criticisms of Judge Hyman) even voluntarily, because there's no basis for thinking that there's anything false and defamatory there.

Still, I think the court erred in approving the overbroad agreed order, which on its face purports to bind entities that had never agreed to it. (I have e-mailed Kelly Hyman and her lawyers to get their side of the story, but haven't heard back from them.) [UPDATE: See here for an odd response I got from one of the lawyers after I put up the original 2020 post.]

To get the Volokh Conspiracy Daily e-mail, please sign up here.

Email *(Required)*

NEXT: Today in Supreme Court History: **December 14, 1964**

EUGENE VOLOKH is the Thomas M. Siebel Senior Fellow at the Hoover Institution at Stanford, and the Gary T. Schwartz Distinguished Professor of Law Emeritus and Distinguished Research Professor at UCLA School of Law. Naturally, his posts here (like the opinions of the other bloggers) are his own, and not endorsed by any institution.

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EXHIBIT 7

“Court Order Complaint to Google,” Lumen
Database (Dec. 9, 2023)

[Search](#)[Topics](#)[Research and Media Mentions](#)[About](#)[Go](#) Exact search

Court Order Complaint to Google

SENDER

Ben Smith

[Private]

US

Sent on December 09, 2023

COUNTRY: US 🇺🇸



RECIPIENT

Google LLC ⓘ

[Private]

Mountain View, CA, 94043, US

SUBMITTER

Google LLC ⓘ

Re: Unknown

NOTICE TYPE: Court Order

Explanation of Court Order

Pursuant to the confidential , court order, which states the following:

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host provider and/or search engine shall remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, or any

statements against Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman on the internet, television, radio, print or any other forms of media including, but not limited to the Sites

Court order 1

SUBJECT

- TARGETED URLS:**
01. <http://conlinpa.com/2016/04/03/hyman-v-daoud/>
 02. <https://beforeitsnews.com/libertarian/2020/11/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case-2763652.html>
 03. <https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>
 04. <https://reason.com/volokh/2021/02/19/attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>
 05. <https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>
 06. <https://www.cbsnews.com/miami/news/notorious-father-faces- eviction-by-daughter/>
 07. <https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>
 08. <https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

JURISDICTIONS US

Supporting Documents



Supporting PDF

TOPICS

[Court Orders](#)

TAGS

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Lumen

[Legal](#)

[Licenses](#)

[Privacy](#)

[Researchers](#)

[Blog Archive](#)

[Spring '22 Research Sprint](#)

[Sign In](#)

EXHIBIT 8

Plaintiff, Kelly Hyman's, Motion to Correct
Clerical Error in Judgment or Order

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR, MIAMI-DADE COUNTY, FLORIDA**

KELLY HYMAN and BOUGANVILLA
INVESTMENTS, INC.,

Plaintiffs,

vs.

ARNOLD DAOUD,

Defendant.

CASE NO.: 12-44972-CA-01

**PLAINTIFF, KELLY HYMAN'S, MOTION TO CORRECT CLERICAL ERROR IN
JUDGMENT OR ORDER**

Plaintiff, KELLY HYMAN (“Ms. Hyman”), by and through the undersigned counsel, files this Motion to Correct Clerical Error In Judgment or Order. As grounds for this motion, Ms. Hyman states as follows:

1. That this motion is made pursuant to Fla.R.Civ.P. 1.540.
2. On or about November 3, 2020 the parties entered into an agreed order which was intended to accomplish the goals of a voluntary settlement between the parties. As part of that agreement, the Defendant was required to take steps necessary to remove from the internet certain disparaging information which he had published – either directly, or else through third parties. A true and correct copy of the order is attached as Exhibit “A”.
3. The order contained a list of website and URL addresses intended to remove all of the disparaging information. However, the order included broader language which made it clear that the intent of the parties was to have *all* such material removed. See e.g. Exhibit “A” page 2 of 7, second paragraph. All told there were approximately twenty five (25) web locations which contained the offending materials.

4. Recently, while engaged in a job search, the Plaintiff came across the disparaging material on the internet in locations in which it should have been removed pursuant to the agreed order.

5. On or about January 19, 2024, while the Plaintiff was attempting to have the material removed, she was advised by staff at Google that the content could not be removed from the following internet locations because they were omitted from the order (“Exhibit B”):

<http://conlinpa.com/2016/04/03/hyman-v-daoud/https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

<https://www.cbsnews.com/miami/news/notorious-father-faces-eviction-by-daughter/>

<https://conlinpa.com/2016/04/03/hyman-v-daoud/>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>

<https://alchetron.com/Alex-Daoud>

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://www.law.com/dailybusinessreview/almID/1202676995842/>

<https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/printer/>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://twitter.com/VolokhC/status/1362798481996349441>

<https://www.cbsnews.com/miami/news/notorious-father-faces-eviction-by-daughter/>

<https://www.law.com/dailybusinessreview/almID/1202676995842/>

<https://reason.com/volokh/2020/11/24/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case/>

<http://conlinpa.com/2016/04/03/hyman-v-daoud/>

<https://www.cbsnews.com/amp/miami/news/notorious-father-faces-eviction-by-daughter/>

<https://amp.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

<https://www.dailymail.co.uk/news/article-2672285/amp/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://www.law.com/dailybusinessreview/almID/1202676995842/>

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>

<https://amp.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://www.inkl.com/news/attempt-to-vanish-to-the-fourth-power-turtles-all-the-way-down>

<https://alchetron.com/Alex-Daoud>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

6. The purpose of rule 1.540 is to provide an exception to the rule of absolute finality by allowing relief under a limited set of circumstances. *Bank of New York Mellon v. Condominium Ass'n of La Mer Estates, Inc.*, 175 So.3d 282 (2015). The rule is liberally construed in favor of facilitating decisions on the merits. See, *Ocwen Loan Servicing, LLC v. Brogdon*, 185 So.3d 627 (Fla. 5th DCA 2016). The rule accomplishes a resolution on the merits by providing a limited exception to absolute finality by allowing relief under limited circumstances. *Bank of New York Mellon v. Condominium Ass'n of La Mer Estates, Inc.*, 175 So.3d 282 (2015).

7. A clerical mistake for the purposes of rule 1.540 is any errors or mistakes arising from an accidental slip or omission, not errors or mistakes in the substance of what is decided by the judgment or order. See, *Moforis v. Moforis*, 977 So.2d 786 (Fla. 4th DCA 2008),

8. Here the substance of the order required the Defendant to remove *all* the offending material. The links set out in paragraph 5 of this motion were omitted by mistake, and it was anticipated that search engines such as Google would cooperate with the order. By re-issuing the

order with all URL addresses included, the Court is simply rectifying the mistake consistent with the intent of the parties.

WHEREFORE, Plaintiff, KELLY HYMAN, respectfully requests this Honorable Court enter an Order granting this Motion, and further enter a corrected order containing the additional links.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed via Florida E-Portal and furnished to all parties this 24th day of January, 2024.

REID BURMAN LEBEDEKER XENICK PEPIN
Counsel for Plaintiff, Kelly Hyman
250 South Australian Avenue, Suite 602
Post Office Drawer 2926
West Palm Beach, FL 33401
Telephone: (561) 659-7700

By: /S/ Bernard A. Lebedeker
Bernard Lebedeker, Esq.
Fla. Bar No. 0042950
Email: bal@reidburmanlaw.com
Jeffrey C. Pepin, Esq.
Fla. Bar No. 416304
Email: jcp@reidburmanlaw.com

EXHIBIT A

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO: 2012-044972-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

Hyman, Kelly

Plaintiff(s)

vs.

Daoud, Arnold

Defendant(s)

**AGREED ORDER TO TAKE DOWN INTERNET POSTING RELATED TO KELLY
HYMAN, PAUL G. HYMAN, JR., KAYLEE HYMAN AND ZACHARY HYMAN**

THIS CAUSE came before the Court on the settlement agreement of the parties and the Court's Order of August 21, 2020, and the Court being fully apprised in its premises, it is hereby

ORDERED AND ADJUDGED that within five (5) days of the date of entry of this Order, Defendant (Arnold A. Daoud), and those acting at his direction (hereinafter referred to as "Daoud") shall remove from the internet and from all social media and from any other place in which Daoud has posted or is responsible for posting or was posted at his direction any references to Kelly Hyman (aka Kelly Daoud aka Kelly Alexandra Hyman, aka Kelly Daoud Hyman aka Kelly Mohre) Paul G. Hyman, Jr., (aka Paul Hyman, aka Paul Hyman, Jr.) Kaylee Hyman (aka Kaylee Rose Hyman) and Zachary Hyman (aka Zachary Paul Hyman) (collectively referred to as "Hyman"), including without limitation, all text, websites, postings, photographs and videos.

ORDERED AND ADJUDGED that this order requires the taking down or deletion of any posting in private or public forum including, but not limited to websites, posts, videos,

comments, google ads, related to or mentioning Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman.

This Order shall apply to, but not be limited to, the following sites and/or internet addresses (collectively referred to as the “Sites”; individually referred to as “Site”):

www. atrociousattorney.com;

www.avariciousadultress.com

www.despicabledaughter.com;

www. shamefulproductions.com

www. phoneyhyman.com;

www. mayorsdaughter.com;

www. kelly.hyman.wtf;

www.tragicmess.com

<http://www.sinsofsouthbeach.com/news/id/25>

<https://www.shamefulproductions.com/the-shameful-past-of-attorney-kelly-hyman-a-timeline/>

<https://www.bitchute.com/video/n0HyDExsXeli/>

http://doSHARE.tips/kelly-hyman- eviction notice_57512e86b6d87f7fb08b4d49.html

<https://fraudonthecourt.blogspot.com/2007/10/complaint-against-judge-hyman.html>- and

the comment- Kellie Daoud said...

It seems like birds of a feather flock together. Judge Paul Hyman's wife, Attorney Kellie Hyman, is tied up in a nasty legal battle with her father, former Miami Beach Mayor Alex Daoud. She is trying to take away his house and evict him! Here is a website that details the whole tragic drama. It's a very good read! TragicMess.com

<https://twitter.com/despicdaughter>

https://twitter.com/DespicDaughter/with_replies

https://www.google.com/imgres?imgurl=https%3A%2F%2Fwww.despicabledaughter.com%2Fwp-content%2Fuploads%2F2015%2F01%2FKelly-Hyman-and-father-Alex-Daoud.png&imgrefurl=https%3A%2F%2Fwww.despicabledaughter.com%2Fauthor%2Falex%2Fpage%2F5%2F&tbnid=EUQgJmw5hVHZCM&vet=12ahUKEwjlcnn1_DqAhXOJc0KHQu9ACgQMygGegUIARCCAQ..i&docid=QGIRy7NDdFCXuM&w=1204&h=726&itg=1&q=kelly%20hyman%20and%20alex%20daoud&ved=2ahUKEwjlcnn1_DqAhXOJc0KHQu9ACgQMygGegUIARCCAQ

<https://www.google.com/url?sa=i&url=https%3A%2F%2Fwww.dailymotion.com%2Fvideo%2Fxo7o0ne4&psig=AOvVaw3KQV5xpbJmvor5B11aAGZn&ust=159605866906000&source=images&cd=vfe&ved=0CDcOr4kDahcKEwjIiJKp9PDqAhUAAAAAHQAAAAAQAg>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Judge-Paul-G-Hyman-JR-FINAL-Ethics-Complaint.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Kelly-Hyman-excerpt-2013-12-5-Hearing.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Case-Attorney-Kelly-Hyman-v-Alex-Daoud.pdf>

<https://phoneyhyman.com/wp-content/uploads/2020/05/Attorney-Kelly-Hyman-Lost-Appeal-80x80.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1-394x218.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/sleepy-kelly-hyman-deposition-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1-394x218.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/sleepy-kelly-hyman-deposition-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/04/Kelly-Hyman-Statement-1024x555-1-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1.png>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Case-Attorney-Kelly-Hyman-v-Alex-Daoud.pdf>

<https://www.mayorsdaughter.com/wp-content/uploads/2020/05/Judge-Paul-G-Hyman-JR-FINAL-Ethics-Complaint.pdf>

<https://phoneyhyman.com/wp-content/uploads/2020/04/Kelly-Hyman-Statement-1024x555-1-288x180.png>

<https://phoneyhyman.com/wp-content/uploads/2020/05/judge-paul-hyman-complaint-730x882-1.png>

<https://www.bing.com/images/search?view=detailV2&ccid=ZgvG3Zou&id=F6850262D4FF9993E98F3F68997C58B34A6592ED&thid=OIP.ZgvG3ZouQ80apTgrVWrZLgHaFj&mediaurl=https%3a%2f%2f.yimg.com%2fvi%2fQ1wSUN8VySU%2fhqdefault.jpg&exph=360&expw=480&q=kelly+hyman+and+phoneyhyman&simid=608017006876098833&ck=F3C3796672B6F7B881479060721488E8&selectedIndex=2&FORM=IRPRST&ajaxhist=0>

<https://www.despicabledaughter.com/wp-content/uploads/2015/01/Kelly-Hyman-Alex-Daoud-Alexander-Daoud.png>

<https://www.youtube.com/watch?v=Q1wSUN8VySU>

FURTHER ORDERED AND ADJUDGED that within ten (10) of being furnished a copy of this Order any internet-related services, internet service provider, host

provider and/or search engine shall

- i. remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, or any statements against Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman on the internet, television, radio, print or any other forms of media including, but not limited to the Sites.
- ii. remove and cause to be removed any derogatory references to Kelly Hyman including, but not limited to any reference to Hyman as an “adulteress,” “blackmailer,” “whore,” “despicable,” “liar,” and/or any derogatory and/or negative comment about Kelly Hyman.
- iii. remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as “prenup paul,” any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.
- iv. remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold “Alex” Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman or Zachary Hyman, which was or is created directly or indirectly by Daoud.

FURTHER ORDERED AND ADJUDGED that Daoud, directly or indirectly, shall not create any new alias, nor use any old alias, to post, host, or make available any statement regarding Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman via the internet, television, radio, print or any other forms of media.

FURTHER ORDERED AND ADJUDGED that this Order does not modify or

alter the settlement agreement of the parties or any prior order of this Court, and that the settlement agreement and all prior orders of this Court remain in full force and effect. This order along with any court documents related directly or indirectly to this matter is prohibited from being posted including, but not limited to any website, and/or social media and/or internet. This Court retains jurisdiction to enforce this order.

DONE AND ORDERED in Chambers in Miami-Dade County, Florida, on this __ day of November 2020.

Circuit Court Judge

cc: Counsel of record

DONE and ORDERED in Chambers at Miami-Dade County, Florida on this 3rd day of November, 2020.



2012-044972-CA-01 11-03-2020 5:58 PM

Hon. Michael Hanzman

CIRCUIT COURT JUDGE

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

Electronically Served:

Alejandro Brito, abrito@zarcolaw.com

Alejandro Brito, apiriou@zarcolaw.com

Alejandro Brito, reception@zarcolaw.com
Bernard A Lebedeker, bal@reidburmanlaw.com
Bernard A Lebedeker, amn@reidburmanlaw.com
Bernardo Burstein, bburstein@bursteinpa.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bburstein@bursteinpa.com
Hon. (Ret.) Gill S. Freeman, gfreeman@jamsadr.com
John W. Salmon, martha@sd-adr.com
Lawrence D Silverman, lawrence.silverman@akerman.com
Lawrence D Silverman, wendy.gonzalez@akerman.com
Michael T Landen, mlanden@klugerkaplan.com
Michael T Landen, mmathis@klugerkaplan.com
Todd A. Levine, tlevine@klugerkaplan.com

Physically Served:

EXHIBIT B

North Florida:
301 W. Bay Street
Suite 14130
Jacksonville, FL 32202

South Florida:
515 North Flagler Drive
Suite P-300
West Palm Beach, FL 33401

(O)(561) 538-9050
(C) (303) 981-7198
kellyhyman@thehymanlawfirm.com
www.thehymanlawfirm.com

Begin forwarded message:

From: removals@google.com
Date: December 18, 2023 at 5:11:06 PM GMT+3
To: Kelly Hyman <kellyhyman@thehymanlawfirm.com>
Subject: [3-1264000035242] Your Request to Google

Hello,

Thanks for reaching out to us.

If a court has issued an order regarding the content in question, please send us a copy of the order and provide the following information:

1. the URL for each web page that contains the allegedly infringing content,
2. the exact text or content from each URL that violates the order, and
3. the specific part of your court order that mandates the removal of these webpages.

Without this information, we cannot consider your request.

Regards,

The Google Team

For more information about our content removal process, see g.co/legal.

EXHIBIT 9

Order on Plaintiff, Kelly Hyman's, Motion to
Correct Clerical Error in Judgment or Order

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO: 2012-044972-CA-01

SECTION: CA43

JUDGE: Thomas J. Rebull

Hyman, Kelly

Plaintiff(s)

vs.

Daoud, Arnold

Defendant(s)

**ORDER ON PLAINTIFF, KELLY HYMAN'S, MOTION TO CORRECT CLERICAL
ERROR IN JUDGMENT OR ORDER**

THIS CAUSE having come before the Court for hearing on March 11, 2024, on Plaintiff, KELLY HYMAN'S, Motion to Correct Clerical Error in Judgment or Order, the Court having reviewed the motion, it is hereby

ORDERED AND ADJUDGED as follows:

1. This order requires the taking down or deletion or deindexing the following links on the internet:

<http://conlinpa.com/2016/04/03/hyman-v-daoud/https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

<https://www.cbsnews.com/miami/news/notorious-father-faces-eviction-by-daughter/>

<https://conlinpa.com/2016/04/03/hyman-v-daoud/>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>

<https://alchetron.com/Alex-Daoud>

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://www.law.com/dailybusinessreview/almID/1202676995842/>

<https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/printer/>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://twitter.com/VolokhC/status/1362798481996349441>

<https://www.cbsnews.com/miami/news/notorious-father-faces-eviction-by-daughter/>

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<http://conlinpa.com/2016/04/03/hyman-v-daoud/>

<https://www.cbsnews.com/amp/miami/news/notorious-father-faces-eviction-by-daughter/>

<https://amp.miamiherald.com/news/local/community/miami-dade/miami-beach/article3985285.html>

<https://www.dailymail.co.uk/news/article-2672285/amp/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

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<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://www.inkl.com/news/attempt-to-vanish-to-the-fourth-power-turtles-all-the-way-down>

<https://alchetron.com/Alex-Daoud>

[https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/Attempt to Vanish My Article About Attempt to Vanish My Article About Attempt to Vanish Other Articles \(reason.com\)](https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/Attempt%20to%20Vanish%20My%20Article%20About%20Attempt%20to%20Vanish%20My%20Article%20About%20Attempt%20to%20Vanish%20Other%20Articles%20(reason.com))

[Notorious Father Faces Eviction - By Daughter - CBS Miami \(cbsnews.com\)](#)

[Why Judge is "Dismayed" and "Disappointed" Over \\$1M Fight Between Father, Daughter | Daily Business Review \(law.com\)](#)

[Overbroad Injunction Used to Try to Vanish Articles About Daughter's Property Lawsuit Against Father \(reason.com\)](#)

[Hyman v. Daoud: A family feud over corporate ownership and control - \(conlinpa.com\)](#)

[Disgraced former Miami Beach mayor in court battle with daughter over million dollar home | Daily Mail Online](#)

[Former Miami Beach Mayor Alex Daoud wins legal battle against daughter over home | Miami Herald](#)

[Miami Beach | Alex Daoud \(therealdeal.com\)](#)

[Father vs. daughter: Former Miami Beach mayor Alex Daoud sued for his house | Miami Herald](#)

[Miami Beach | Alex Daoud \(therealdeal.com\)](#)

[Alex Daoud - Alchetron, The Free Social Encyclopedia](#)

[HYMAN V. DAOUD :: 2016 :: Florida Third District Court of Appeal Decisions :: Florida](#)

[Case Law :: Florida Law :: US Law :: Justia](#)

[St. George University \(Grenada\) - The 2nd Chance Med School for Flunkies and the Road to Riches for its Founder, Charles Modica – Telegraph](#)

[Disgraced former Miami Beach mayor in court battle with daughter over million dollar home | Daily Mail Online](#)

[Attempt to Vanish My Article About Attempt to Vanish My Article About Attempt to Vanish Other Articles \(reason.com\)](#)

[Overbroad Injunction Used to Try to Vanish Articles About Daughter's Property Lawsuit Against Father \(reason.com\)](#)

[Notorious Father Faces Eviction - By Daughter - CBS Miami \(cbsnews.com\)](#)

[Why Judge is "Dismayed" and "Disappointed" Over \\$1M Fight Between Father, Daughter | Daily Business Review \(law.com\)](#)

[Hyman v. Daoud: A family feud over corporate ownership and control - \(conlinpa.com\)](#)

[Disgraced former Miami Beach mayor in court battle with daughter over million dollar home | Daily Mail Online](#)

[410 Deleted by author — Medium](#)

[Former Miami Beach Mayor Alex Daoud wins legal battle against daughter over home | Miami Herald](#)

[Sins of South Beach- \(the content has been removed, but shows up in the google search- Sins of South Beach <4957C65761744B12BA1F8D1EE76E3779.png>](#)

[sinsofsouthbeach.com](#)

<https://www.sinsofsouthbeach.com>

Daoud's personal life took another hit when his daughter, Kelly Hyman, sued him for ownership of his home! Alex Daoud's ex-wife, Terri Noe, in an embarrassing ...

[Miami Beach | Alex Daoud \(therealdeal.com\)](#)

[Father vs. daughter: Former Miami Beach mayor Alex Daoud sued for his house | Miami Herald](#)

[Alex Daoud - Alchetron, The Free Social Encyclopedia](#)

[Miami Beach | Alex Daoud \(therealdeal.com\)](#)

[HYMAN V. DAOUD :: 2016 :: Florida Third District Court of Appeal Decisions :: Florida Case Law :: Florida Law :: US Law :: Justia](#)

[Kelly Hyman - EverybodyWiki Bios & Wiki](#)

[Libertarian Links and Resources - Libertarian Guide](#)

[An Odd Response from One of the Lawyers in the Kelly Hyman v. Alex Daoud Case \(reason.com\)](#)

[Attempt to Vanish My Article About Attempt to Vanish... \(inkl.com\)](#)

[Order Document - 2012-044972-CA-01 \(reason.com\)](#)

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

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<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://otherweb.com/o/YcIpnvLU>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>

[https://golden.com/wiki/Kelly_Hyman_\(attorney\)-5KPDVWK](https://golden.com/wiki/Kelly_Hyman_(attorney)-5KPDVWK)

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in->

[his-home/](#)

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

<https://alchetron.com/Alex-Daoud>

<https://miamimayorsdaughter.com/2021/11/29/how-i-prevented-my-father-from-being-homeless-and-got-nothing-to-show-for/>

<https://miamimayorsdaughter.com/2021/02/17/dad-what-is-wrong-with-this-picture/>

<https://miamimayorsdaughter.com/author/miamidaughter/>

<https://reason.com/wp-content/uploads/2020/11/HymanvDaoud.pdf>

<https://reason.com/volokh/2020/11/24/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case/>

[ConLaw Class 28: Modern Substantive Due Process III: Protecting "Dignity" \(reason.com\)](#)

<https://reason.com/volokh/2020/11/24/overbroad-injunction-used-to-try-to-vanish-articles-about-daughters-property-lawsuit-against-father/>

<https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

<https://www.dailymail.co.uk/news/article-2672285/Disgraced-former-Miami-Beach-mayor-court-battle-daughter-million-dollar-home.html>

[Why Judge is "Dismayed" and "Disappointed" Over \\$1M Fight Between Father, Daughter | Daily Business Review \(law.com\)](#)

<https://conlinpa.com/2016/04/03/hyman-v-daoud/>

<https://www.sinsofsouthbeach.com/>

<https://kellyhymanlawyer.medium.com/>

<https://therealdeal.com/miami/2014/06/27/former-miami-beach-mayor-battles-daughter-over-home/>

<https://otherweb.com/o/YcIpnvLU>

<https://www.miamiherald.com/news/local/community/miami-dade/miami-beach/article1972934.html>

[https://golden.com/wiki/Kelly_Hyman_\(attorney\)-5KPDVWK](https://golden.com/wiki/Kelly_Hyman_(attorney)-5KPDVWK)

<https://therealdeal.com/miami/2014/11/18/judge-former-miami-beach-mayor-can-stay-in-his-home/>

<https://alchetron.com/Alex-Daoud>

<https://miamimayorsdaughter.com/2021/11/29/how-i-prevented-my-father-from-being-homeless-and-got-nothing-to-show-for/>

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

https://en.everybodywiki.com/Kelly_Hyman

<https://miamimayorsdaughter.com/author/miamidaughter/>

<https://www.idcrawl.com/alex-daoud>

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

<https://www.leagle.com/decision/inadvflco180130001335>

<https://law.justia.com/cases/florida/third-district-court-of-appeal/2016/3d14-2984.html>

https://en.m.wikipedia.org/wiki/Draft:Kelly_Hyman

2. Within ten (10) days of being furnished a copy of this Order, any internet-related services, internet service provider, host provider and/or search engine shall
 - i. remove and cause to be removed and/or deindexed from the internet the links above; and/or
 - ii. remove and cause to be removed from any Site (including the web sites themselves and all URLs and links, even if they change) all statements, posts, social media, or videos or documents related to directly or indirectly to this lawsuit, and/or Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman and/or any website or posting defamatory, slander, or any statements against Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman on the internet, television, radio, print or any other forms of media including, but not limited to the Sites.
 - iii. remove and cause to be removed any derogatory references to Kelly Hyman including, but

not limited to any reference to Hyman as an “adulteress,” “blackmailer,” “whore,” “despicable,” “liar,” and/or any derogatory and/or negative comment about Kelly Hyman.

- iv. remove or cause to be removed any derogatory reference to Paul G. Hyman, Jr., including, but not limited to any reference to him as “prenup paul,” any judicial complaint and/or any derogatory comment about him including but not limited to any alleged misconduct.
 - v. remove and cause to be removed statements, documents, videos, and/or postings about this lawsuit, Kelly Hyman v. Arnold Alex Daoud; related to the house located at 1750 Michigan Ave, Miami Beach, Florida; any communication between Kelly Hyman and Arnold “Alex” Daoud; and/or any libelous, defamatory, and/or slanderous websites, videos, internet posts and/or social media posts about Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman or Zachary Hyman, which was or is created directly or indirectly by Daoud.
3. Daoud, directly or indirectly, shall not create any new alias, nor use any old alias, to post, host, or make available any statement regarding Kelly Hyman, Paul G. Hyman, Jr., Kaylee Hyman and Zachary Hyman via the internet, television, radio, print or any other forms of media.
 4. This Order does not modify or alter the settlement agreement of the parties or any prior order of this Court, and that the settlement agreement and all prior orders of this Court remain in full force and effect. This order along with any court documents related directly or indirectly to this matter is prohibited from being posted including, but not limited to any website, and/or social media and/or internet. This Court retains jurisdiction to enforce this order.

DONE and **ORDERED** in Chambers at Miami-Dade County, Florida on this 13th day of March, 2024.


2012-044972-CA-01 03-13-2024 1:59 PM

2012-044972-CA-01 03-13-2024 1:59 PM
Hon. Thomas J. Rebull

CIRCUIT COURT JUDGE
Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

Electronically Served:

Alejandro Brito, abrito@britopllc.com
Alejandro Brito, apiriou@britopllc.com
Alejandro Brito, lcoello@britopllc.com
Bernard A Lebedeker, bal@reidburmanlaw.com
Bernard A Lebedeker, gmb@reidburmanlaw.com
Bernardo Burstein, bburstein@bursteinpa.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bursteinandassociates@gmail.com
Bernardo Burstein, bburstein@bursteinpa.com
Guisella Barron, gmb@reidburmanlaw.com
Hon. (Ret.) Gill S. Freeman, gfreeman@jamsadr.com
John W. Salmon, service2@sd-adr.com
Lawrence D Silverman, lawrence.silverman@sidley.com
Lawrence D Silverman, gportes@sidley.com
Lawrence D Silverman, efilenotice@sidley.com
Michael T Landen, mlanden@klugerkaplan.com
Michael T Landen, mmathis@klugerkaplan.com
Todd A. Levine, tlevine@klugerkaplan.com

Physically Served:

EXHIBIT 10

Email from Angelina Wood
dated Oct. 17, 2024

RANDAZZA
LEGAL GROUP

Marc Randazza <mjr@randazza.com>

Takedown demand came from Blue Ocean Global Tech

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Angelina Wood <angelina.wood@blueoceanglobaltech.com>
Sent: Thursday, October 17, 2024 5:27:11 AM
To: Volokh, Eugene <volokh@law.ucla.edu>
Subject: Request for Link Removal as per Court Order

You don't often get email from angelina.wood@blueoceanglobaltech.com. [Learn why this is important](#)

Hello,

I am reaching out to request the removal of the following link from your website, as per a court order:

- <https://reason.com/volokh/2020/11/24/an-odd-response-from-one-of-the-lawyers-in-the-kelly-hyman-v-alex-daoud-case/>
- <https://reason.com/volokh/2023/12/14/attempt-to-vanish-my-article-about-attempt-to-vanish-my-article-about-attempt-to-vanish-other-articles/>

I've attached a copy of the [court order](#) for you to look over. Please proceed with removing the links at your earliest convenience.

Thank you for taking the time to look into this matter.

Sincerely,
Angelina