

FILED
07-14-2023
Anna Maria Hodges
Clerk of Circuit Court
2023FJ000002

EXHIBIT A

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Jerry J. Jen, Esq. (Bar #263243)
 Jen Law Firm, A Professional Corporation
 5777 W. Century Blvd., Suite 880
 Los Angeles, CA 90045

TEL NO.: (310) 853-2298 FAX NO. (optional): (310) 295-2418

E-MAIL ADDRESS (Optional):

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

STREET ADDRESS: 400 McAllister St.

MAILING ADDRESS: 400 McAllister St.

CITY AND ZIP CODE: San Francisco, CA 94102

BRANCH NAME: Civic Center Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: John Doe 1

DEFENDANT: Cloudflare, Inc.

CASE NUMBER:

CPF-21-517455

ABSTRACT OF JUDGMENT—CIVIL AND SMALL CLAIMS

☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address
 PATRICK S. TOMLINSON
 2613 N. Oakland Ave.,
 Milwaukee, WI 53211

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]: 1068

☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

PATRICK S. TOMLINSON c/o Brinton J. Resto, Esq.
 200 Park Avenue, Suite 200, Orange Village, OH 44122

2. ☐ Information on additional judgment debtors is shown on page 2.4. ☐ Information on additional judgment creditors is shown on page 2.

3. Judgment creditor (name and address):

JOHN DOE 1, an individual

c/o - Jen Law Firm, APC

5777 W. Century Blvd., Suite 880, Los Angeles, CA 90045

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: 02/25/2022

Jerry J. Jen, Esq. - Attorney for Judgment Creditor

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed: \$23,739.25

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:

7. All judgment creditors and debtors are listed on this abstract.

a. Amount: \$

b. In favor of (name and address):

8. a. Judgment entered on (date): 09/30/2021

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.b. ☐ been ordered by the court effective until (date):12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.b. ☐ A certified copy of the judgment is attached.

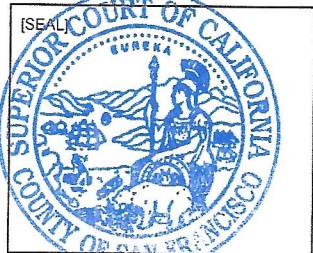
This abstract issued on (date):

MAR 07 2022

CLERK OF THE COURT

Clerk, by

CAROLYN BALISTRENI Deputy



PLAINTIFF: John Doe 1
DEFENDANT: Cloudflare, Inc.

COURT CASE NO.:
CPF-21-517455

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (CA Bar No. 226112)

Jeffrey M. Rosenfeld (CA Bar No. 222187)

Ruben Peña (CA Bar No. 328106)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

jeff@KRInternetLaw.com

ruben@KRInternetLaw.com

Attorneys for Petitioner John Doe

FILED
San Francisco County Superior Court

SEP 30 2021

CLERK OF THE COURT

BY: [Signature]
Deputy Clerk**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO****JOHN DOE 1, an individual,**

Petitioner,

v.

CLOUDFLARE, INC.,

Respondent.

Case No. CPF-21-517455

DISCOVERY**[PROPOSED] ORDER GRANTING
PETITIONER JOHN DOE 1'S
PETITION TO QUASH SUBPOENA TO
CLOUDFLARE, INC. ISSUED FOR
CASE PENDING IN FOREIGN
JURISDICTION PURSUANT TO CCP
§2029.600 AND REQUEST FOR
SANCTIONS****PATRICK S. TOMLINSON,**

Plaintiff,

v.

JOHN DOES 1-60, NAMES UNKNOWN,

Defendants.

In re out-of-state action:*Patrick S. Tomlinson v. John Does 1-60,
Names Unknown, Case No. 2021CV000500
State of Wisconsin Circuit Court,
Milwaukee County*

Filed by John Doe 1

Date: September 30, 2021

Time: 9:30 a.m.

Ctrm.: 302

Before: The Hon. Ethan P. Schulman

Case No. CPF-21-517455

**[PROP.] ORDER GRANTING PETITIONER'S
PETITION TO QUASH SUBPOENA**

1 The Court, having reviewed and considered Petitioner John Doe's motion to quash subpoena
2 issued to Cloudflare, Inc., the memorandum of points and authorities and declarations in support
3 thereof, the other related papers and pleadings on file herein, and the arguments of counsel presented
4 at the hearing, and with good cause appearing therefor:

5 The attached report and recommendation of the judge pro tem is adopted in part. For the
6 reasons ably and thoughtfully discussed in the report, Petitioner John Doe's motion to quash
7 subpoena issued to Cloudfare, Inc. is granted. (See also *in re Rule 45 Subpoenas Issued to Google*
8 *LLC and LinkedIn Corporation Dated July 23, 2020* (N.D. Cal. 2020) 337 F.R.D. 639, 649-651
9 [granting anonymous blogger's motion to quash subpoenas issued to web-based e-mail provider and
10 professional networking website that sought information concerning blogger's identity and contact
11 information where plaintiff company failed to produce competent evidence supporting prima facie
12 case of defamation].)

13 Petitioner's request for a mandatory award of sanctions pursuant to Code Civ. Proc. §
14 1987.2(c) is granted in the amount of \$23,739.25 in attorneys' fees and costs, which the Court finds
15 is a reasonable and well-documented amount. (See *Roe v Halbig* (2016) 29 Cal.App.5th 286, 306,
16 309 [anonymous blogger who filed motion to quash subpoena issued to online service provider,
17 which sought to reveal blogger's identity for purposes of out-of-state defamation action, was entitled
18 to attorneys' fees as a prevailing party under § 1987.2(c) where investigator voluntarily dismissed
19 subpoena].)

20
21 **IT IS SO ORDERED.**


22
23 DATED: Sept. 30, 2021

24 

The Hon. Ethan P. Schulman
JUDGE OF THE SUPERIOR COURT

EXHIBIT B

MC-012

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Jerry J. Jen, Esq. FIRM NAME: Jen Law Firm, A.P.C. STREET ADDRESS: 5777 W. Century Blvd., Suite 880 CITY: Los Angeles TELEPHONE NO.: (310) 853-2298 E-MAIL ADDRESS: jjjen@jenlawfirm.com ATTORNEY FOR (name): Judgment Creditor, JOHN DOE 1	STATE BAR NUMBER: 263243 STATE: CA ZIP CODE: 90045 FAX NO.: (310) 295-2418
	
FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Francisco 07/13/2022 Clerk of the Court BY: RONNIE OTERO Deputy Clerk	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister St. MAILING ADDRESS: 400 McAllister St. CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse	
PLAINTIFF: John Doe 1 DEFENDANT: Cloudflare, Inc.	
MEMORANDUM OF COSTS AFTER JUDGMENT, ACKNOWLEDGMENT OF CREDIT, AND DECLARATION OF ACCRUED INTEREST	
CASE NUMBER: CPF-21-517455	

1. ☒ **Postjudgment costs**

a. I claim the following costs after judgment incurred within the last two years (indicate if there are multiple items in any category):

	Dates Incurred	Amount
(1) Preparing and issuing abstract of judgment		\$
(2) Recording and indexing abstract of judgment		\$
(3) Filing notice of judgment lien on personal property		\$
(4) Issuing writ of execution, to extent not satisfied by Code Civ. Proc., § 685.050 (specify county):	03/07/2022	\$ 40.00
(5) Levying officers fees, to extent not satisfied by Code Civ. Proc., § 685.050 or wage garnishment		\$ 0.00
(6) Approved fee on application for order for appearance of judgment debtor, or other approved costs under Code Civ. Proc., § 708.110 et seq.		\$ 0.00
(7) Attorney fees, if allowed by Code Civ. Proc., § 685.040	07/11/2022	\$ 5,757.55
(8) Other: Subpoena / Service (Statute authorizing cost): CCP § 708.030		\$ 162.75
(9) Total of claimed costs for current memorandum of costs (add items (1)–(8))		\$ 5,960.30
b. All previously allowed postjudgment costs		\$ 1,164.25
c. Total of all postjudgment costs (add items a and b)		\$ 7,124.55

2. ☐ **Credits to interest and principal**

a. I acknowledge total payments to date in the amount of: \$0.00 (including returns on levy process and direct payments). The payments received are applied first to the amount of accrued interest, and then to the judgment principal (including postjudgment costs allowed) as follows: credit to accrued interest: \$0.00; credit to judgment principal \$0.00.

b. **Principal remaining due:** The amount of judgment principal remaining due is \$23,739.25. (See Code Civ. Proc., § 680.300)

3. ☒ **Accrued interest remaining due:** I declare interest accruing (at the legal rate) from the date of entry or renewal and on balances from the date of any partial satisfactions (or other credits reducing the principal) remaining due in the amount of \$1,846.00.4. I am the: ☐ judgment creditor ☐ agent for the judgment creditor ☒ attorney for the judgment creditor.

I have knowledge of the facts concerning the costs claimed above. To the best of my knowledge and belief, the costs claimed are correct, reasonable, and necessary, and have not been satisfied.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 07/11/2022

Jerry Jen, Esq. - Attorney for Judgment Creditor

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

NOTICE TO THE JUDGMENT DEBTOR

If this memorandum of costs is filed at the same time as an application for a writ of execution, any statutory costs, not exceeding \$100 in aggregate and not already allowed by the court, may be included in the writ of execution. The fees sought under this memorandum may be disallowed by the court upon a motion to tax filed by the debtor, notwithstanding the fees having been included in the writ of execution. (Code Civ. Proc., § 685.070(e).) A motion to tax costs claimed in this memorandum must be filed within 10 days after service of the memorandum. (Code Civ. Proc., § 685.070(c).)

Page 1 of 2



THE ANNEXED INSTRUMENT IS A
CORRECT COPY OF THE ORIGINAL
ON FILE IN MY OFFICE.
ATTEST, CERTIFIED

OCT 28 2022

CLERK OF THE COURT
Superior Court of California, County of San Francisco
BY: *Araceli Vallejo*
ARACELI VALLEJO DEPUTY CLERK

MC-012

Short Title: John Doe 1 v. Cloudflare, Inc.

CASE NUMBER:
CPF-21-517455

PROOF OF SERVICE

☒ Mail ☐ Personal Service

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My residence or business address is:
5777 W. Century Blvd., Suite 880
Los Angeles, CA 90045
3. ☒ I mailed or personally delivered a copy of the *Memorandum of Costs After Judgment, Acknowledgment of Credit, and Declaration of Accrued Interest* as follows (complete either a or b):
 - a. ☒ **Mail.** I am a resident of or employed in the county where the mail occurred.
 - (1) I enclosed a copy in an envelope AND
 - (a) ☐ **deposited** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - (b) ☒ **placed** the envelope for collection and mailing on the date and at the place shown in items below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
 - (2) The envelope was addressed and mailed as follows:
(Also Electronically by E-mail where listed).
 - (a) Name of person served: *** PLEASE SEE ATTACHMENT 1.
 - (b) Address on envelope: *** PLEASE SEE ATTACHMENT 1.
 - (c) Date of mailing: 07/13/2022
 - (d) Place of mailing (city and state): Los Angeles, CA
 - b. ☐ **Personal delivery.** I personally delivered a copy as follows.
 - (1) Name of person served:
 - (2) Address where delivered:
 - (3) Date delivered:
 - (4) Time delivered:



I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 07/13/2022

Jerry Jen

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

MC-025

SHORT TITLE:

John Doe 1 v. Cloudflare, Inc.

CASE NUMBER:

CPF-21-517455

ATTACHMENT (Number): 1

(This Attachment may be used with any Judicial Council form.)

SERVICE LIST

Patrick S. Tomlinson
2613 N. Oakland Avenue
Milwaukee, WI 53211

Judgment Debtor

Rodney N. Mayr, Esq.
Mayr Law Firm PC
5701 Makati Cir, Box 9
San Jose, CA 95123-6222
rodney@mayrlawfirm.com

Attorney for Judgment Debtor

Brinton J. Resto, Esq.
200 Park Avenue, Suite 200
Orange Village, OH 44122
bresto@minclaw.com

Attorney for Judgment Debtor

Cloudflare, Inc.
c/o Registered Agent Solutions, Inc.
1220 S Street, Suite 150
Sacramento, CA 95811
legalresponses@cloudflare.com

Respondent

Jeffrey Rosenfeld, Esq.
Ruben Pena, Esq.
Kronenberger Rosenfeld, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
jeff@KRInternetLaw.com
ruben@KRInternetLaw.com

Attorney for Petitioner & Judgment Creditor



(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1

(Add pages as required)

EXHIBIT C

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

JOHN DOE 1, an individual
% JEN LAW FIRM, APC
5777 W. CENTURY BLVD, SUITE 880
LOS ANGELES, CALIFORNIA 90045
Plaintiff/Creditor,

v.

CLASSIFICATION CODE: 30301

CASE NO:

PATRICK S. TOMLINSON,
2613 N. OAKLAND AVENUE
MILWAUKEE, WISCONSIN 53211
Defendant/Debtor.

**PETITION AND AFFIDAVIT TO REGISTER AND DOCKET FOREIGN
JUDGMENT**

The above named Plaintiff/Creditor by their Attorneys, West & Dunn by Attorney David J. Pawlowski, state and allege as follows:

1. On September 30, 2021, Plaintiff/Creditor was granted a Judgment against the Defendant/Debtor Patrick S. Tomlinson in Case Number. CPF-21-517455, in the Superior Court for the State of California in the County of San Francisco, said Court being a Court of general jurisdiction then and there having jurisdiction over the Parties and the subject matter

of the Action. An authenticated and exemplified copy of the Abstract of Judgment is attached hereto and is made a part hereof as Exhibit A and an authenticated and exemplified copy of the Memorandum of Costs After Judgment, Acknowledgement of Credit, and Declaration of Accrued Interest is attached hereto and is made a part hereof as Exhibit B.

2. The Judgment balance through September 30, 2021 is \$23,739.25, see Exhibit A plus costs in the amount of \$7,124.55 and accrued interest in the amount of \$1,846.00, see Exhibit B resulting in a total outstanding balance due and owing from Defendant/Debtor to Plaintiff/Creditor in the amount of \$32,709.80.
3. The Plaintiff/Creditor address is, as shown in the caption above, % Jen Law Firm, APC, 5777 W. Century Blvd, Suite 880, Los Angeles, California 90045.
4. The last known address of the Defendant/Debtor, Patrick S. Tomlinson is, as shown in the caption above, 2613 North Oakland Avenue, Milwaukee, Wisconsin 53211.

WHEREFORE, the Plaintiff/Creditor requests that said Judgment in the total amount of \$32,709.80, be registered and docketed in the Circuit Court for Milwaukee County, Wisconsin pursuant to Wis. Stat. Section 806.24, commonly known as the Uniform Enforcement of Foreign Judgments Act.

WEST & DUNN By:



Attorney David J. Pawlowski
Attorney for Creditor/Plaintiff
State Bar ID No. 1001346
100 Maritime Drive, Suite 1D
Manitowoc, WI 54420
920.249.5550
dpawlowski@westdunn.com

STATE OF WISCONSIN)
) ss
MANITOWOC COUNTY)

David J. Pawlowski, attorney for the Plaintiff/Creditor, being first duly sworn on oath, states that he has read the above and foregoing Petition by him subscribed, knows the contents thereof, and the same are true in substance and in fact.


David J. Pawlowski

Subscribed and sworn to before me
this 6th day of January, 2023

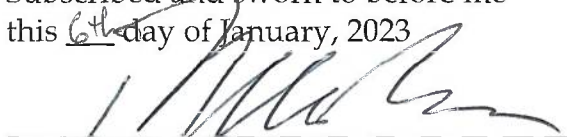
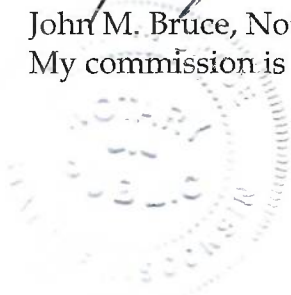

John M. Bruce, Notary Public
My commission is permanent

Exhibit A

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Jerry J. Jen, Esq. (Bar #263243)

Jen Law Firm, A Professional Corporation

5777 W. Century Blvd., Suite 880

Los Angeles, CA 90045

TEL NO.: (310) 853-2298

FAX NO. (optional): (310) 295-2418

E-MAIL ADDRESS (Optional):

☒ ATTORNEY FOR
 ☒ JUDGMENT CREDITOR
 ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

STREET ADDRESS: 400 McAllister St.

MAILING ADDRESS: 400 McAllister St.

CITY AND ZIP CODE: San Francisco, CA 94102

BRANCH NAME: Civic Center Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: John Doe 1

DEFENDANT: Cloudflare, Inc.

CASE NUMBER:

CPF-21-517455

**ABSTRACT OF JUDGMENT—CIVIL
AND SMALL CLAIMS**☐ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address
 PATRICK S. TOMLINSON
 2613 N. Oakland Ave.,
 Milwaukee, WI 53211

b. Driver's license no. [last 4 digits] and state:

☒ Unknown

c. Social security no. [last 4 digits]: 1068

☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

PATRICK S. TOMLINSON c/o Brinton J. Resto, Esq.
 200 Park Avenue, Suite 200, Orange Village, OH 44122

2. ☐ Information on additional judgment debtors is shown on page 2.

4. ☐ Information on additional judgment creditors is shown on page 2.

3. Judgment creditor (name and address):

JOHN DOE 1, an individual

c/o - Jen Law Firm, APC

5777 W. Century Blvd., Suite 880, Los Angeles, CA 90045

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: 02/25/2022

Jerry J. Jen, Esq. - Attorney for Judgment Creditor

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:
\$23,739.25

10. ☐ An ☐ execution lien ☐ attachment lien is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): 09/30/2021

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.b. ☐ been ordered by the court effective until (date):

12. a. ☒ I certify that this is a true and correct abstract of the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

This abstract issued on (date):

MAR 07 2022

CLERK OF THE COURT

Clerk, by

CAROLYN BALISTRIEN Deputy

PLAINTIFF: John Doe 1
DEFENDANT: Cloudflare, Inc.

COURT CASE NO.:
CPF-21-517455

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

Driver's license no. [last 4 digits] and state:

☐ Unknown

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20. ☐ Continued on Attachment 20.

KRONENBERGER ROSENFELD, LLP

Karl S. Kronenberger (CA Bar No. 226112)

Jeffrey M. Rosenfeld (CA Bar No. 222187)

Ruben Peña (CA Bar No. 328106)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@KRInternetLaw.com

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ruben@KRInternetLaw.com

Attorneys for Petitioner John Doe

FILED
San Francisco County Superior Court

SEP 30 2021

CLERK OF THE COURT

BY: 

Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO****JOHN DOE 1, an individual,**

Petitioner,

v.

CLOUDFLARE, INC.,

Respondent.

PATRICK S. TOMLINSON,

Plaintiff,

v.

JOHN DOES 1-60, NAMES UNKNOWN,

Defendants.

Case No. CPF-21-517455

DISCOVERY**[PROPOSED] ORDER GRANTING
PETITIONER JOHN DOE 1'S
PETITION TO QUASH SUBPOENA TO
CLOUDFLARE, INC. ISSUED FOR
CASE PENDING IN FOREIGN
JURISDICTION PURSUANT TO CCP
§2029.600 AND REQUEST FOR
SANCTIONS****In re out-of-state action:***Patrick S. Tomlinson v. John Does 1-60,
Names Unknown, Case No. 2021CV000500
State of Wisconsin Circuit Court,
Milwaukee County*

Filed by John Doe 1

Date: September 30, 2021

Time: 9:30 a.m.

Ctm.: 302

Before: The Hon. Ethan P. Schulman

Case No. CPF-21-517455

**[PROP.] ORDER GRANTING PETITIONER'S
PETITION TO QUASH SUBPOENA**

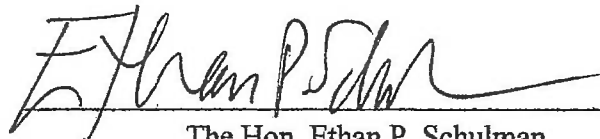
1 The Court, having reviewed and considered Petitioner John Doe's motion to quash subpoena
2 issued to Cloudflare, Inc., the memorandum of points and authorities and declarations in support
3 thereof, the other related papers and pleadings on file herein, and the arguments of counsel presented
4 at the hearing, and with good cause appearing therefor:

5 The attached report and recommendation of the judge pro tem is adopted in part. For the
6 reasons ably and thoughtfully discussed in the report, Petitioner John Doe's motion to quash
7 subpoena issued to Cloudfare, Inc. is granted. (See also *in re Rule 45 Subpoenas Issued to Google*
8 *LLC and LinkedIn Corporation Dated July 23, 2020* (N.D. Cal. 2020) 337 F.R.D. 639, 649-651
9 [granting anonymous blogger's motion to quash subpoenas issued to web-based e-mail provider and
10 professional networking website that sought information concerning blogger's identity and contact
11 information where plaintiff company failed to produce competent evidence supporting prima facie
12 case of defamation].)


13 Petitioner's request for a mandatory award of sanctions pursuant to Code Civ. Proc. §
14 1987.2(c) is granted in the amount of \$23,739.25 in attorneys' fees and costs, which the Court finds
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16 309 [anonymous blogger who filed motion to quash subpoena issued to online service provider,
17 which sought to reveal blogger's identity for purposes of out-of-state defamation action, was entitled
18 to attorneys' fees as a prevailing party under § 1987.2(c) where investigator voluntarily dismissed
19 subpoena].)

20
21 **IT IS SO ORDERED.**

22
23 DATED: Sept. 30, 2021



The Hon. Ethan P. Schulman
JUDGE OF THE SUPERIOR COURT

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Jerry J. Jen, Esq. FIRM NAME: Jen Law Firm, A.P.C. STREET ADDRESS: 5777 W. Century Blvd., Suite 880 CITY: Los Angeles TELEPHONE NO.: (310) 853-2298 E-MAIL ADDRESS: jjen@jenlawfirm.com ATTORNEY FOR (name): Judgment Creditor, JOHN DOE 1	STATE BAR NUMBER: 263243 STATE: CA ZIP CODE: 90045 FAX NO.: (310) 295-2418 FOR COURT USE ONLY <div style="text-align: center;">  </div> ELECTRONICALLY FILED Superior Court of California, County of San Francisco 07/13/2022 Clerk of the Court BY: RONNIE OTERO Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister St. MAILING ADDRESS: 400 McAllister St. CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse	
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MEMORANDUM OF COSTS AFTER JUDGMENT, ACKNOWLEDGMENT OF CREDIT, AND DECLARATION OF ACCRUED INTEREST	
CASE NUMBER: CPF-21-517455	

1. ☒ **Postjudgment costs**

a. I claim the following costs after judgment incurred within the last two years (indicate if there are multiple items in any category):

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(1) Preparing and issuing abstract of judgment		\$
(2) Recording and indexing abstract of judgment		\$
(3) Filing notice of judgment lien on personal property		\$
(4) Issuing writ of execution, to extent not satisfied by Code Civ. Proc., § 685.050 (specify county):	03/07/2022	\$ 40.00
(5) Levying officers fees, to extent not satisfied by Code Civ. Proc., § 685.050 or wage garnishment		\$ 0.00
(6) Approved fee on application for order for appearance of judgment debtor, or other approved costs under Code Civ. Proc., § 708.110 et seq.		\$ 0.00
(7) Attorney fees, if allowed by Code Civ. Proc., § 685.040	07/11/2022	\$ 5,757.55
(8) Other: Subpoena / Service (Statute authorizing cost): CCP § 708.030		\$ 162.75
(9) Total of claimed costs for current memorandum of costs (add items (1)–(8))		\$ 5,960.30
b. All previously allowed postjudgment costs		\$ 1,164.25
c. Total of all postjudgment costs (add items a and b)		\$ 7,124.55

2. ☐ **Credits to interest and principal**

a. I acknowledge total payments to date in the amount of: \$0.00 (including returns on levy process and direct payments). The payments received are applied first to the amount of accrued interest, and then to the judgment principal (including postjudgment costs allowed) as follows: credit to accrued interest: \$0.00; credit to judgment principal \$0.00.

b. Principal remaining due: The amount of judgment principal remaining due is \$23,739.25. (See Code Civ. Proc., § 680.300)

3. ☒ **Accrued interest remaining due:** I declare interest accruing (at the legal rate) from the date of entry or renewal and on balances from the date of any partial satisfactions (or other credits reducing the principal) remaining due in the amount of \$1,846.00.4. I am the: ☐ judgment creditor ☐ agent for the judgment creditor ☒ attorney for the judgment creditor.

I have knowledge of the facts concerning the costs claimed above. To the best of my knowledge and belief, the costs claimed are correct, reasonable, and necessary, and have not been satisfied.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 07/11/2022

Jerry Jen, Esq. – Attorney for Judgment Creditor

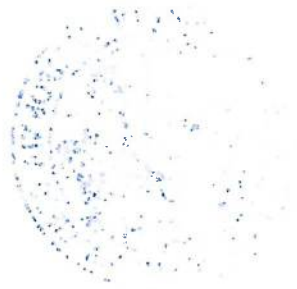
(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

NOTICE TO THE JUDGMENT DEBTOR

If this memorandum of costs is filed at the same time as an application for a writ of execution, any statutory costs, not exceeding \$100 in aggregate and not already allowed by the court, may be included in the writ of execution. The fees sought under this memorandum may be disallowed by the court upon a motion to tax filed by the debtor, notwithstanding the fees having been included in the writ of execution. (Code Civ. Proc., § 685.070(e).) A motion to tax costs claimed in this memorandum must be filed within 10 days after service of the memorandum. (Code Civ. Proc., § 685.070(c).)

Page 1 of 2



THE ANNEXED INSTRUMENT IS A
CORRECT COPY OF THE ORIGINAL
ON FILE IN MY OFFICE.
ATTEST, CERTIFIED

OCT 28 2022

CLERK OF THE COURT
Superior Court of California, County of San Francisco
By: *Araceli Vallejo*
ARACELI VALLEJO DEPUTY CLERK

MC-012

Short Title: John Doe 1 v. Cloudflare, Inc.

CASE NUMBER:
CPF-21-517455

PROOF OF SERVICE

☒ Mail ☐ Personal Service

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My residence or business address is:
5777 W. Century Blvd., Suite 880
Los Angeles, CA 90045
3. ☒ I mailed or personally delivered a copy of the *Memorandum of Costs After Judgment, Acknowledgment of Credit, and Declaration of Accrued Interest* as follows (complete either a or b):
 - a. ☒ **Mail.** I am a resident of or employed in the county where the mail occurred.
 - (1) I enclosed a copy in an envelope AND
 - (a) ☐ **deposited** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - (b) ☒ **placed** the envelope for collection and mailing on the date and at the place shown in items below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
 - (2) The envelope was addressed and mailed as follows:
(Also Electronically by E-mail where listed).
 - (a) Name of person served: *** PLEASE SEE ATTACHMENT 1.
 - (b) Address on envelope: *** PLEASE SEE ATTACHMENT 1.
 - (c) Date of mailing: 07/13/2022
 - (d) Place of mailing (city and state): Los Angeles, CA
 - b. ☐ **Personal delivery.** I personally delivered a copy as follows.
 - (1) Name of person served:
 - (2) Address where delivered:
 - (3) Date delivered:
 - (4) Time delivered:



I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 07/13/2022

Jerry Jen

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

MC-025

SHORT TITLE:

John Doe 1 v. Cloudflare, Inc.

CASE NUMBER:

CPF-21-517455

ATTACHMENT (Number): 1

(This Attachment may be used with any Judicial Council form.)

SERVICE LIST

Patrick S. Tomlinson
2613 N. Oakland Avenue
Milwaukee, WI 53211

Judgment Debtor

Rodney N. Mayr, Esq.
Mayr Law Firm PC
5701 Makati Cir, Box 9
San Jose, CA 95123-6222
rodney@mayrlawfirm.com

Attorney for Judgment Debtor

Brinton J. Resto, Esq.
200 Park Avenue, Suite 200
Orange Village, OH 44122
bresto@minclaw.com

Attorney for Judgment Debtor

Cloudflare, Inc.
c/o Registered Agent Solutions, Inc.
1220 S Street, Suite 150
Sacramento, CA 95811
legalresponses@cloudflare.com

Respondent

Jeffrey Rosenfeld, Esq.
Ruben Pena, Esq.
Kronenberger Rosenfeld, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
jeff@KRInternetLaw.com
ruben@KRInternetLaw.com

Attorney for Petitioner & Judgment Creditor

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this
Attachment are made under penalty of perjury.)

Page 1 of 1

(Add pages as required)



EXHIBIT D

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

JOHN DOE 1, an individual
% JEN LAW FIRM, APC
5777 W. CENTURY BLVD, SUITE 880
LOS ANGELES, CALIFORNIA 90045
Plaintiff/Creditor,

v.

Case No. 23 FJ 2
Class Code: 30301

PATRICK S. TOMLINSON,
2613 N. OAKLAND AVENUE
MILWAUKEE, WISCONSIN 53211
Defendant/Debtor.

ORDER FOR SUPPLEMENTAL EXAMINATION

Based on the attached Affidavit of David J. Pawlowski, the Plaintiff, John Doe 1, as judgment creditor, is entitled to a supplemental examination of Defendant Patrick S. Tomlinson, pursuant to § 816.03, Wis. Stats.

IT IS HEREBY ORDERED that the Defendant in this above-referenced matter appears before me, Honorable Peter Hemmer, a Court Commissioner for Milwaukee County, Wisconsin, at the Hemmer Law Offices, LLC, **5232 West Oklahoma Avenue, Milwaukee, Wisconsin, on Wednesday April 19, 2023, at 1:30 p.m.,** to answer under oath questions concerning the judgment debtor's property and finances.

IT IS FURTHER HEREBY ORDERED that the Defendant produces at the

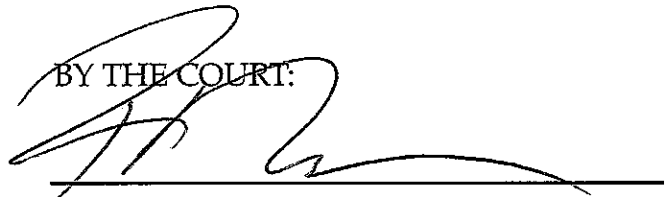
examination the following in regard to the Defendant: all income tax records for the last two (3) years; the Deed to any real estate in which the Defendant has an interest; title to any vehicle(s) to which the Defendant has an interest; all checkbooks, bank books, account statements or other evidence of deposits of money in any financial institution; any and all policies of life insurance in which the Defendant has an interest; and evidence of all retirement funds, pension plans, stocks, bonds, and annuities in which the Defendant has an interest.

IT IS FURTHER ORDERED that the Defendant answer the attached Interrogatories and Request for Production of Documents and bring the Answers and documents to the above-scheduled examination.

FAILURE TO COMPLY WITH THIS ORDER AND TO APPEAR AT THE HEARING MAY RESULT IN THE DEFENDANT BEING HELD IN CONTEMPT OF COURT.

Dated this 15th day of March, 2023.

BY THE COURT:

A handwritten signature in black ink, appearing to read 'Peter Hemmer', written over a horizontal line.

Honorable Peter Hemmer
Court Commissioner, Milwaukee County

EXHIBIT E

AFFIDAVIT OF SERVICE

State of Wisconsin

County of Milwaukee

Circuit Court

Case Number: 23FJ2 Court Date: 4/19/2023 1:30 pm

Plaintiff:

JOHN DOE 1

vs.

Defendant:

PATRICK S TOMLINSON

For:

West & Dunn

207 W. Main St.

Waunakee, WI 53597

Received by SOUTHEAST WISCONSIN PROCESS, LLC to be served on **PATRICK S TOMLINSON, 2613 N OAKLAND AVE, MILWAUKEE, WI 53211.**

I, Shannon Gutierrez, being duly sworn, depose and say that on the **30th day of March, 2023 at 10:53 am, I:**

Personally Served the within named person with the **Order for Supplemental Examination, Affidavit in Support of Order for Supplemental Examination and Plaintiff's First Set of Interrogatories and Request for Production of Documents to Discover Defendant's Financial Condition** with the date and hour endorsed thereon by me, pursuant to Wisconsin State Statutes.

Additional Information pertaining to this Service:

3-18-23 7:15 pm No answer. No answer at neighbors.

3-20-23 9:15 am No answer. No activity.

3-22-23 12:05 pm Did an internet search on Patrick and found that he is currently out of the country.

3-29-23 9:00 am No answer No activity.

Description of Person Served: Age: 30s, Sex: M, Race/Skin Color: White, Height: 5'7", Weight: 200, Hair: Brown, Glasses: N

I certify that I am over the age of 18, I am a resident of the State of Wisconsin and have no interest in the above action.

Subscribed and Sworn before me on the 30th day of March, 2023 in Waukesha, State of Wisconsin


NOTARY PUBLIC

My Commission Expires

5.4.24
Shannon Gutierrez
Process Server

SOUTHEAST WISCONSIN PROCESS, LLC
707 W. Moreland Blvd., Suite 2
Waukesha, WI 53188
(262) 650-8904

Our Job Serial Number: MDN-2023004292
Service Fee: \$45.00



EXHIBIT F

FILED

04-21-2023

Anna Maria Hodges

Clerk of Circuit Court

2023CV0002836

Honorable Pedro Colon-18

Branch 18

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

In the Matter of the Voluntary Amortization of Debts of:

Niki Robinson and Patrick Tomlinson
2613 North Oakland Avenue
Milwaukee, WI 53211

Case Code 31007

Petitioners.

Petition to Amortize Debts - Wis. Stats. § 128.21

1. Petitioners are adult residents of Milwaukee County, Wisconsin, residing at:

2613 North Oakland Avenue
Milwaukee, WI 53211
2. Petitioners are indebted beyond their ability to pay debts as they mature, and the assistance of the court is needed in the amortization of such indebtedness pursuant to Wisconsin Statute § 128.21.
3. Petitioners believe that unless the assistance of the court is obtained for the amortization of indebtedness pursuant to Wis. Stats. § 128.21, creditors will continue to harass petitioners by the issuance of garnishment, attachment, or execution.
4. Petitioners are of the opinion and belief that they will be able to make future payments at regular intervals according to a plan of amortization so as to amortize their indebtedness over a period of not more than three (3) years.
5. Petitioner's request that they be allowed to make monthly payments directly to the Trustee in an amount set-forth in the proposed Order submitted with this petition.
6. Attached is Petitioner's affidavit of debts to be included in the plan.
7. Petitioner's request that they be permitted to amortize debts pursuant to Wis. Stats. § 128.21 and that a plan of amortization as may be proposed by the Trustee, and submitted to creditor(s), be approved by the Court.
8. Petitioners have submitted a proposed Order appointing the Trustee and enjoining the creditors listed in this Petition from further collection procedures.

Dated this 21 day of April 2023



Niki Robinson



Patrick Tomlinson

Subscribed and sworn to before me
this 21 day of April 2023



Notary Public, Wisconsin

My Commission Expires Permanent

MARK A. GAUTHIER
Notary Public
State of Wisconsin

Electronically signed by Joshua C. Rittberg
Attorney at Law

Bar Number: 1052139

MILLER & MILLER
633 W. Wisconsin Avenue Suite 500
Milwaukee, WI 53203
414-277-7742 - Telephone
414-277-1303 - Facsimile
josh@millermillerlaw.com

EXHIBIT G

Dated this 21st day of April 2023

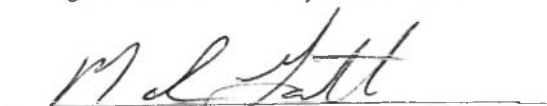


Niki Robinson



Patrick Tomlinson

Subscribed and sworn to before me
this 21 day of April 2023



Notary Public, Wisconsin

My Commission Expires Permanently

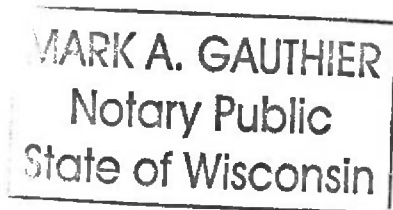


EXHIBIT H



Patrick S. Tomlinson
@stealthygeek

...

No, stalker. Your forums celebrate all the criminal actions you have taken against my family. You, personally, have said you'd celebrate if I was murdered during one of the dozens of SWATting you have paid to direct against our home. And no, stalker. We don't face bankruptcy.

9:35 PM · May 1, 2023 · 10 Views



Patrick S. Tomlinson
@stealthygeek

...

Replying to [@tommyrodeoclown](#) [@spratja](#) and 2 others

We don't owe your criminal cyberstalking cult a penny, stalker. That was never a possibility. No, stalker, we're not "near poverty," and I've been successfully self-employed since 2008. And if we were "near poverty," how would we have money for foreign vacations?

Enjoy prison.

11:05 PM · Mar 9, 2023 · 58 Views



Patrick S. Tomlinson
@stealthygeek

Replying to [@AtheistsL](#) and [@ded_ruckus](#)

I didn't unblock you, whomever you are. And quasi is not owed a penny from us.

8:19 PM · Mar 26, 2023 · 20 Views



Patrick S. Tomlinson
@stealthygeek

...

Replying to @tommyrodeoclow and @jsdrown

We owe nothing at all stalker. That was never a possibility. And it's not your tweets that are sending you to prison.

4:43 PM · Mar 8, 2023 · 32 Views



Blue Wave Barry   
@wave_barry75814

...

Is that a quote from quasi?

Cause, sweetie? You are 100% going to pay him.

Seethe but do make an attempt to cope as well. Mental health is important, kiddo!

12:50 PM · May 3, 2023 · 23 Views

1 Like



Patrick S. Tomlinson @stealthygeek · 1h
No, stalker. It isn't. And no, stalker. We aren't. Enjoy prison.

...



16



Patrick S. Tomlinson
@stealthygeek

...

We owe nothing, stalker. Enjoy prison.

10:40 PM · Apr 28, 2023 · 9 Views

Patrick S. Tomlinson @stealthygeek · 18h

Quasi isn't owed a penny, stalker. Enjoy prison.



1



57



Curly Bill Brocius

@bill_broclinson

...

Pat should really be focusing on his outstanding debt than the politics of a state he doesn't live in.

How was that debtors exam, Patrick?

10:00 PM · Apr 19, 2023 · **106** Views

2 Retweets

4 Likes



Patrick S. Tomlinson @stealthygeek · 11m

...

There wasn't one and never will be, stalker. Enjoy prison.



9



Clarence Whorley - @ClarenceWhorley · 1h

Have you paid the debt you owe yet?

payquasi.lol



1



15



Patrick S. Tomlinson @stealthygeek · 47m

Don't have one, stalker. Enjoy prison.



Patrick S. Tomlinson @stealthygeek · 1m

...

We don't have any, stalker. Enjoy prison.



2



Patrick S. Tomlinson @stealthygeek · 1h

...

I'm neither, stalker. No exam today, or any other day. Enjoy prison.



56



I just received my first ad revenue payment from Twitter.

1st check = \$10K (!!!)

I would typically never share personal financial info but creators need to know that @elonmusk means BUSINESS supporting the creator economy



Congratulations @bennyjohnson!

As your share of our ads revenue in replies, you're receiving \$9,546. Your portion will be deposited into your Stripe-connected account within the next 72 hours. Thank you for being a creator on Twitter!



1



77



Patrick S. Tomlinson

@stealthygeek

Made that this month, stalker. Enjoy prison.

9:54 PM · Jul 13, 2023 · 17 Views

https://twitter.com/stealthygeek/status/1670520874267815040/photo/1

EXHIBIT I

***LAW OFFICES OF
MONT L. MARTIN
TRUSTEE***

P.O. Box 26557

Milwaukee, WI 53226-0557

www.wi128trustee.com

Phone: (414) 258-5787

Fax: (414) 258-6510

Legal Assistants:

Kathy Hoefgen

Susan Wyman

June 15, 2023

Honorable Pedro A. Colon
Milwaukee County Courthouse
901 North 9th Street
Milwaukee, WI 53233

RE: Chapter 128 Plan for Niki Robinson and Patrick Tomlinson
Case No. 23-CV-002836

Dear Judge Colon:

Enclosed please find my Certificate and Order for Dismissal. The Plan has defaulted because the debtor has failed to make any payments and has not responded to my inquiries.

If dismissal meets with your approval, please sign the Order. A copy of the Order will then be forwarded to all interested parties.

Thank you.

Very truly yours,

Mont L. Martin

Mont L. Martin
Trustee

MLM:128 staff

Encl.

cc: Niki Robinson and Patrick Tomlinson (w/ encl.)
Miller & Miller (electronic notice)

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

IN THE MATTER OF THE PROCEEDINGS FOR
THE AMORTIZATION OF THE DEBT OF

Case No. 23-CV-002836

Niki Robinson and Patrick Tomlinson
2613 North Oakland Avenue
Milwaukee, WI 53211

CERTIFICATE

Debtor.

I, Mont L. Martin, trustee of the above captioned case certifies as follows:

1. I am the Trustee on the above-entitled action.
2. Payments have not been received from or on behalf of the debtor(s) in 30 days or more. Notice of default was provided to the debtor(s) and counsel for the debtor(s). The debtor has not responded.
3. No final account is attached since no money was ever received.
4. The Certificate is submitted in support of an Order Reopening the case, if it has been administratively closed, terminating the injunction against creditors herein, dismissing your affiant as trustee and dismissing these proceedings.

DATED at Milwaukee, Wisconsin this 15th day of June, 2023..

Mont L. Martin

Mont L. Martin, Trustee

FILED

06-20-2023

Anna Maria Hodges

Clerk of Circuit Court

2023CV002836

DATE SIGNED: June 20, 2023

Electronically signed by Honorable Pedro A. Colon
Circuit Court Judge

STATE OF WISCONSIN

CIRCUIT COURT

MILWAUKEE COUNTY

IN THE MATTER OF THE PROCEEDINGS FOR
THE AMORTIZATION OF THE DEBT OF

Case No. 23-CV-002836

Niki Robinson and Patrick Tomlinson
2613 North Oakland Avenue
Milwaukee, WI 53211

ORDER FOR DISMISSAL
(Non-Payment)

Debtor(s)

Upon the Certificate of the Trustee, Mont L. Martin, stating that the debtor has made no plan payments, and upon the files, records and proceedings had herein:

IT IS HEREBY ORDERED, as follows:

1. The injunction prohibiting creditors from executing judgment against the debtor is terminated;
2. That all interested parties shall be notified of the dismissal herein;
3. These proceedings are dismissed;
4. Mont L. Martin is discharged as Trustee upon notification to interested parties of this dismissal.