

Docketed 2/27/2024

LAW OFFICES OF
BEAUREGARD, BURKE & FRANCO

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THE ANDREW ROBESON HOUSE
32 WILLIAM STREET
NEW BEDFORD, MA 02740

PHILIP N. BEAUREGARD
RICHARD E. BURKE, JR.
MICHAEL FRANCO
ADRIENNE CATHERINE H. BEAUREGARD-RHEAUME
COLIN P. BURKE

TEL.: (508) 993-0333
FAX: (508) 990-2045
FAX: (508) 990-2002

Website: www.bbflawoffices.com
E-Mail: partners@bbflawoffices.com
HON. WILLIAM H. CAREY (1925-2015)

OF COUNSEL
JAMES HODGSON
PETER L. PAULL, JR., P.C.

Via First-Class Mail

February 22, 2024

Lionel Frederique Target
995 Southern Artery, Apt. 210
Quincy, MA 02169-8408

Re: Tyler Martin v. Lionel Frederique Target
Docket No. 2382CV00881

FOURTEEN-DAY (14) NOTICE TO ALL PARTIES

Dear Mr. Frederique Target:

Pursuant to Mass. R. Civ. P. 55(b)(2), please be advised that on March 20, 2024 at 2:30 pm there will be a Damage Assessment Hearing conducted via Zoom, Meeting ID 160 489 5466.

At said hearing, Plaintiff will seek the following from the Court:

1. Award Plaintiff Tyler Martin compensatory damages in the total sum of twenty-one thousand one hundred nine dollars (\$21,109.00), with pre- and post-judgment interest at the statutory rate running from May 31, 2023 until judgment is satisfied, and reasonable court costs;
2. Defendant Lionel Target permanently enjoined and restrained from directly or indirectly creating or publishing statements about Plaintiff, or aiding or

participating in the creation or publication of statements about Plaintiff, which defame, disparage, or contain libelous statements about Plaintiff;

3. Defendant Lionel Target ordered to take all actions necessary to permanently delete any video containing the Defamatory Statements from YouTube and any other website or search engine, including Google, Bing, and Yahoo, where they may appear, including if they are republished or copied in the future;
4. In the event that the Defendant fails to remove the Defamatory Statements as ordered herein, any platform on which the Defamatory Statements are published or republished, including but not limited to YouTube, authorized and ordered to remove any and all videos containing the Defamatory Statements;
5. The “Defamatory Statements” are that Plaintiff is an abuser, sexual predator, pedophile, child pornographer, and groomer;
6. The “Defamatory Statements” currently appear at the following URLs:
 - a. https://www.youtube.com/watch?v=ZJQJKsuFY5k&ab_channel=Desolance;
 - b. <https://www.youtube.com/watch?v=2oO8zzovPWQ>;
 - c. <https://www.youtube.com/watch?v=wZywurtsetw>;
 - d. https://www.youtube.com/watch?v=vT3y6jWr_n4&ab_channel=Desolance;
 - e. https://www.youtube.com/watch?v=7yj2LR2AqSQ&ab_channel=Desolance;
 - f. https://www.youtube.com/watch?v=LQLuiBlEvsY&ab_channel=Desolance;

- g. [https://www.youtube.com/watch?v=3vizMJnFxoU&ab_channel=Desolance;](https://www.youtube.com/watch?v=3vizMJnFxoU&ab_channel=Desolance)
- h. https://www.youtube.com/watch?v=WIKwHRbeCLI&ab_channel=Desolance
- i. <https://www.youtube.com/watch?v=ihDYBpIlbqw;>
- j. [https://www.youtube.com/watch?v=kQ_EaaNnzV4&ab_channel=Desolance;](https://www.youtube.com/watch?v=kQ_EaaNnzV4&ab_channel=Desolance)
- k. <https://www.youtube.com/watch?v=TCoB7BnQAfI;>
- l. <https://www.youtube.com/watch?v=lxwvc-7bbHs;>
- m. [https://www.youtube.com/watch?v=yyI-GcQlRGo&ab_channel=Desolance;](https://www.youtube.com/watch?v=yyI-GcQlRGo&ab_channel=Desolance)
- n. <https://www.youtube.com/watch?v=7ySYZrSOlhw;>
- o. https://www.youtube.com/watch?v=Og2YMdXnawg&ab_channel=Desolance
- p. <https://www.youtube.com/watch?v=7ySYZrSOlhw;>
- q. [https://www.youtube.com/watch?v=8k1MaHbL-2g&ab_channel=Desolance;](https://www.youtube.com/watch?v=8k1MaHbL-2g&ab_channel=Desolance)
- r. [https://www.youtube.com/watch?v=dsDetxrjOfw&ab_channel=Desolance;](https://www.youtube.com/watch?v=dsDetxrjOfw&ab_channel=Desolance)
- s. [https://www.youtube.com/watch?v=F-bAYIraIoQ&ab_channel=Desolance;](https://www.youtube.com/watch?v=F-bAYIraIoQ&ab_channel=Desolance)
- t. <https://www.youtube.com/watch?v=pjjG6xJAEFY;>
- u. [https://www.youtube.com/watch?v=24F7CxpU8jo&ab_channel=Desolance;](https://www.youtube.com/watch?v=24F7CxpU8jo&ab_channel=Desolance)

- v. <https://www.youtube.com/watch?v=QIo-M68r2cg;>
- w. https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance;
- x. https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance;
- y. https://www.youtube.com/watch?v=Ir3xcpbViEk&ab_channel=Desolance;
- z. https://www.youtube.com/watch?v=3bbR2YgJ9Ao&ab_channel=Desolance;
- aa. <https://www.youtube.com/watch?v=KLytwY9O1X0;>
- bb. https://www.youtube.com/watch?v=liqZKeoK6_s&ab_channel=Desolance;
- cc. https://www.youtube.com/watch?v=UoBNVda8leo&ab_channel=Desolance;
- dd. https://www.youtube.com/watch?v=Wol297NFEfA&ab_channel=Desolance;
- ee. https://www.youtube.com/watch?v=Di-BTS4N9so&ab_channel=Desolance;
- ff. https://www.youtube.com/watch?v=WP3JKfxlQXU&ab_channel=Desolance;
- gg. https://www.youtube.com/watch?v=xzE7cPPNZro&ab_channel=Desolance;
- hh. https://www.youtube.com/watch?v=oC8ygo9TY3M&ab_channel=Desolance;

- ii. https://www.youtube.com/watch?v=JXnTl4BR1mE&ab_channel=Desolance;
- jj. https://www.youtube.com/watch?v=rNIS1_ym6Ac&ab_channel=Desolance;
- kk. https://www.youtube.com/watch?v=bU7PUfXw_yU&ab_channel=Desolance;
- ll. https://www.youtube.com/watch?v=k6iR4EwKZBI&ab_channel=Desolance;
- mm. https://www.youtube.com/watch?v=W09RF2M2oIs&ab_channel=Desolance;
- nn. https://www.youtube.com/watch?v=gcZzXCGtnEA&ab_channel=Desolance;
- oo. https://www.youtube.com/watch?v=VxY2ozthCrs&ab_channel=Desolance;
- pp. [https://www.youtube.com/watch?v=Hu86_XpKUuI](https://www.youtube.com/watch?v=Hu86_XpKUuI;);
- qq. https://www.youtube.com/watch?v=E5hTGr5iKRQ&ab_channel=Desolance;
- rr. https://www.youtube.com/watch?v=3vF84jGkuZM&ab_channel=Desolance;
- ss. [https://www.youtube.com/watch?v=KaE_FbrbbBo](https://www.youtube.com/watch?v=KaE_FbrbbBo;);
- tt. https://www.youtube.com/watch?v=-oifj_5vBxM&ab_channel=Desolance;
- uu. https://www.youtube.com/watch?v=pdCStNlX6K4&ab_channel=Desolance;

- vv. https://www.youtube.com/watch?v=r9n3X_k9QAU&ab_channel=Desolance;
- ww. https://www.youtube.com/watch?v=yAfU6bBaO-A&ab_channel=Desolance;
- xx. https://www.youtube.com/watch?v=i-BjOo-1Y2A&ab_channel=Desolance;
- yy. https://www.youtube.com/watch?v=cVlIEjASacU&ab_channel=Desolance;
- zz. https://www.youtube.com/watch?v=sSis8mSivWY&ab_channel=Desolance;
- aaa. https://www.youtube.com/watch?v=gQHwvnxyx1w&ab_channel=Desolance; and

7. Defendant ordered to take all necessary action, including requesting removal from webmasters, hosting platforms, Internet service providers, YouTube, and search engines including but not limited to Google, Yahoo, and Bing, to remove any additional webpages in the future on which the Defamatory Statements and/or videos contained at the URLs listed above, including but not limited to index, directory, and search results pages.

Very truly yours,



Adrienne Catherine H. Beauregard-Rheaume

ACHBR/mp