

Commonwealth of Massachusetts

SUFFOLK, ss.
Joachim Martillo
&
Epistemography LLC

PLAINTIFF(S),

TRIAL COURT OF THE COMMONWEALTH
BOSTON MUNICIPAL COURT DEPARTMENT
DORCHESTER DIVISION

CIVIL No. 1907CV0023

v.
Twitter, Inc.

DEFENDANT(S)

SUMMONS

THIS SUMMONS IS DIRECTED TO Twitter, Inc
(Defendant's name)

1. This Notice is to inform you that you are being sued. The person or business suing you is known as the Plaintiff. A copy of the Plaintiff's Complaint against you is attached and the original has been filed in the Dorchester Division of the Boston Municipal Court Department. You must respond to this lawsuit in writing. If you do not respond, the Plaintiff may obtain a court order requiring you to pay money or provide other relief.

2. You must respond within 20 days to protect your rights. In order to protect your right to defend yourself in this lawsuit, you must deliver or mail a written response called an "Answer" to both the "Clerk's Office for Civil Business, Boston Municipal Court Department, Dorchester Division, 510 Washington Street, Dorchester, MA 02124" and to the individual below:

Joachim Martillo at 75 Bailey St. Ste LL, Dorchester Center
(name of Plaintiff or Plaintiff's attorney) (address) MA 02124-3724

Your Answer must be delivered or mailed within 20 days from the date the Summons was delivered to you. If you need more time to respond, you may request an extension of time in writing from the Court.

3. Your Answer must respond to each claim made by the Plaintiff. Your Answer is your written response to the statements made by the Plaintiff in the Complaint. In your Answer you must state whether you agree or disagree with each paragraph of the Complaint. You may agree with some of the things the Plaintiff says and disagree with other things. You may also say that you do not know whether one (or more) of the statements made in the Plaintiff's Complaint is true. If you want to have your case heard by a jury, you must specifically request a jury trial in your Answer. Even if you agree that you owe what is claimed, sending an Answer will provide you with an opportunity to participate and explain your circumstances.

4. You must list any reason why you should not have to pay the Plaintiff what the Plaintiff asks for. If you have any reason(s) why the Plaintiff should not get what the Plaintiff asks for in the Complaint, you must write those reasons (or "defenses") in your Answer.

5. You may lose this case if you do not send an Answer to the Court and the Plaintiff. If you do not mail or deliver the Answer within 20 days, you may lose this case. You will have no opportunity to tell your side of the story and the Court may order that the Plaintiff receive everything requested in the Complaint. The Court may allow a motion permitting the Plaintiff take your property and/or wages. If you respond to the Complaint and appear at the hearing, you will get an impartial hearing by a judge. Even if you choose to discuss this matter with the Plaintiff (or the Plaintiff's lawyer), you should still send your Answer within 20 days. Even if you file an Answer, you can still reach an agreement with the Plaintiff.

6. Legal Assistance. You may wish to get legal help from a lawyer. If you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case. You may also obtain information at www.mass.gov/courts/selfhelp.

7. You can also sue the Plaintiff. If you believe the Plaintiff owes you money or has harmed you in some way related to the lawsuit, you must describe that in your Answer. If you do not include these claims (called "Counterclaims") in your written response, you may lose your ability to sue the Plaintiff about anything related to this lawsuit.

8. You or your attorney must attend all court hearings. If you send your Answer to the Court and the Plaintiff, you will protect your rights. The Court will send you a notice telling you the date, time, and place of an impartial hearing before a judge. The judge will hear both sides of any arguments and schedule any additional hearings.

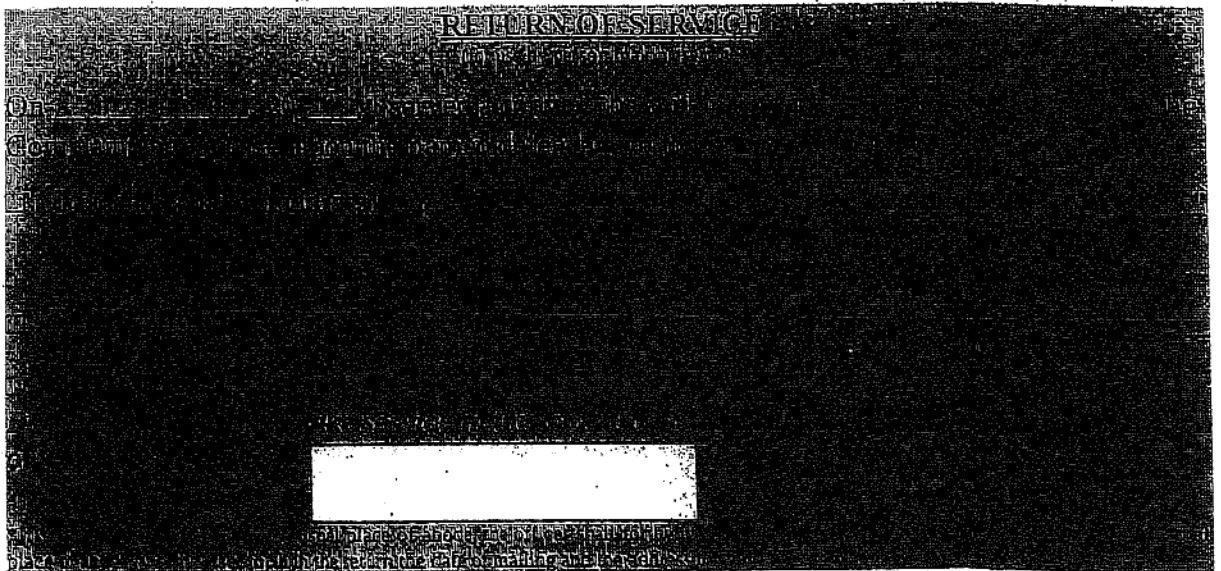
9. The civil number appearing on the front of this notice is the case docket number and must appear on the front of your Answer.

Witness Hon. James W. Coffey, First Justice on _____, 20____

(SEAL)


Clerk-Magistrate

Note: The number assigned to the Complaint by the Clerk-Magistrate at the beginning of the lawsuit should be indicated on the summons before it is served on the Defendant.



Commonwealth of Massachusetts

Dorchester, ss.

Boston Municipal Court Department
of the
Trial Court of Massachusetts

Joachim Carlo Santos Martillo, and)
Epistemography LLC)
Plaintiffs)
)
vs.)
)
Twitter, Inc.)
Defendant)
_____)

Civil Action No.: 1907CV00023

Complaint and Demand for Jury Trial (submitted January 25, 2019)

With this civil action the Plaintiffs seek both compensation and also remedy for damages, violations, and torts all suffered at the hands of the Defendant.

Table of Contents

The Parties.....	3
Plaintiff Joachim Martillo.....	3
Plaintiff Epistemography LLC.....	3
Defendant Twitter, Inc.....	3
Related Proceedings.....	3
Jurisdiction and Venue.....	3
Introduction.....	3
Statement of Facts.....	4
Plaintiffs’ Claims.....	6
Count I: Libel <i>per se</i>	6
Count II: Tort of Outrage.....	6
Count III: Interference with Constitutional Right of Freedom of Expression.....	7
Compensation for Damages, for Torts, for Statutory Violations, and for Costs.....	7
Jury Demand.....	8

The Parties

Plaintiff Joachim Martillo

1. Joachim Martillo (Martillo) is a citizen of the Commonwealth of Massachusetts (USA) and Dorchester resident. His address is 75 Bailey St. Ste 1L, Dorchester Center, MA 02124-3724. His phone number is 617-276-5788.

Plaintiff Epistemography LLC

2. Epistemography LLC (Epistemography) is a patent agency serving inventors, patent applicants, patent owners, petitioners in post-grant review proceedings, and law firms worldwide. Its address is 75 Bailey St. Ste 1L, Dorchester Center, MA 02124-3724. Its Massachusetts company number is 001325578. Joachim Martillo is manager of Epistemography LLC. Its phone number is 617-276-5788.

Defendant Twitter, Inc.

3. Twitter, Inc. (Twitter) operates as a platform for public self-expression and conversation in real time. The company offers various products and services, including the Twitter platform that allows users to consume, create, distribute, and discover content. Its address is 1355 Market Street Suite 900, San Francisco, CA 94103, United States. Its phone number is 415-222-9670.

Related Proceedings

4. There are no related proceedings.

Jurisdiction and Venue

5. Mass. General Laws chapter 223A, §§ 1 through 11 confer proper jurisdiction to the Dorchester Division of the Boston Municipal Court Department of the Trial Court of Massachusetts.

6. Venue is proper by Mass. General Laws chapter 223, § 2 and Mass. General Laws chapter 218, § 54.

Introduction

7. By means of violations of both common and also statutory law, Defendant Twitter usurps the Constitutional authority of the state and federal courts in an unlawful effort to limit the Constitutional right of freedom of speech. In said effort, Defendant Twitter libeled Plaintiff Martillo as well as Plaintiff Epistemography and subjected these two Plaintiffs to malicious and legally actionable abuse.

Statement of Facts

8. Plaintiff Martillo has a background in Eastern European and Jewish historical political economics from Harvard and Yale Universities. He has a background in classical literature and languages from the classics program at the Pingry School, a college preparatory school then located in Elizabeth, NJ, and now located in Basking Ridge, NJ. He has on various broadcast programs occasionally provided expertise (in the role of a paid expert) on subjects related to Judaism, related to political economics, or related to Zionism.

9. Plaintiff Martillo has held a personal Twitter account (@ThorsProvoni) since March 2009. Plaintiff Epistemography has held a corporate Twitter account (@Epistemography) since October 2018.

10. Among many Twitter tweets on many subjects, Plaintiff Martillo used this background to dispute Zionist propaganda on the Twitter platform for several years. After the intensity and coordination of Zionist propagandists (*hasbarah*-mongers) on the Twitter platform began to grow with increasing public challenge to Zionist narrative, claims, and actions, Twitter Support determined that such tweets, which have hardly varied over a period of years, suddenly represented violations of Twitter rules. Twitter Support suspended both Plaintiff Martillo's personal twitter account and also the business Twitter account of Plaintiff Epistemography.

11. Twitter Support falsely and maliciously alleged that Plaintiff Martillo (@ThorsProvoni) was suspended for the following reason.

Hello Joachim Martillo,

Your account, ThorsProvoni has been suspended for violating the [Twitter Rules](#).

Specifically, for:

Violating our rules against hateful conduct.

You may not promote violence against, threaten, or harass other people on the basis of race, ethnicity, national origin, sexual orientation, gender, gender identity, religious affiliation, age, disability, or serious disease.

12. No similar explanation was provided for the suspension of Plaintiff Epistemography (@Epistemography), but Twitter Support disseminated its false and malicious allegation across the Twitter platform.



Confronting Denial
@AgainstDenial

Follow

Replying to @AgainstDenial @epistemography @whitepuppyman

What happen fren

@epistemography

Account suspended

Twitter suspends accounts which violate the [Twitter Rules](#)

2:25 AM - 9 Jan 2019



13. No @Epistemography tweet violated any Twitter rule. Plaintiff Martillo was trying politely to engage Confronting Denial (@AgainstDenial) in a discussion of the ethnic composition of early Soviet governments. Confronting Denial is a particularly hateful and impolite tweeter, who flings accusations of lying at anyone disagreeing with his simplistic and uncontextualized view of history. Confronting Denial espouses the German National Socialist idea of Jewish ethnonationality and race in order to justify essentialist and primordialist claims to Palestine.

14. Under the Doctrine of *Respondeat Superior*, Defendant Twitter has committed the offence of libel *per se* against both Plaintiff Martillo and also Plaintiff Epistemography.

- a. Twitter Support published written libel. Twitter Support published the libel to third parties on the Twitter platform. There was no obvious reason to do so. This action is at least negligent and will be shown to be malicious.
- b. Twitter Support specifically named the two Plaintiffs.
- c. The statements of Twitter Support were alleged to constitute facts and not opinion. Twitter Support claimed these statements were based in fact. These statements were defamatory in that they accused the two Plaintiffs of hateful conduct and rules violations.
- d. The statements of Twitter Support were false because the two Plaintiffs neither engaged in hateful conduct nor in rules violations.

- e. No privilege is associated with Twitter Support's false and libelous assertions against the two Plaintiffs.
- f. Twitter Support's assertion of rules violation and of hateful conduct caused injury to the Plaintiffs
 - o because personal and business reputations were harmed and
 - o because Twitter Support has both
 - substantially damaged the ability of Plaintiff Martillo to engage clients that need expertise in either the classics, Jewish historical political economics, or debating with Zionists; and also
 - substantially decreased the potential of Plaintiff Epistemography to attract clients that need expertise in Intellectual Property.

15. The World Wide Web is a (virtual) public space. Defendant Twitter purports to provide a framework for free and public discussion of all sorts of topics. The Twitter platform has become an important forum for national political debate and discussion. Yet Twitter Support uses the false and libelous accusation of hateful conduct to deprive users of the freedom that Defendant Twitter alleges to provide with respect to expression (online speech).

16. Under the Doctrine of *Respondeat Superior*, Defendant Twitter limits freedom of speech and violates Mass. General Laws chapter 12, §§ 11H-11I (Massachusetts Civil Rights Act).

Plaintiffs' Claims

Count I: Libel *per se*

17. All of the foregoing allegations are incorporated at this point as if they were fully set forth in detail in this count.

18. Defendant Twitter, Inc. must cease libeling the two Plaintiffs, must publicly retract its libel, must publicly apologize for its libel, and must fully compensate the two Plaintiffs for the libel *per se*.

Count II: Tort of Outrage

19. All of the foregoing allegations are incorporated at this point as if they were fully set forth in detail in this count.

20. Twitter Support intentionally inflicted emotional distress upon Plaintiff Martillo. Under the Doctrine of *Respondeat Superior*, Defendant Twitter must fully compensate Plaintiff Martillo for intentional infliction of emotional distress.

Count III: Interference with Constitutional Right of Freedom of Expression

21. All of the foregoing allegations are incorporated at this point as if they were fully set forth in detail in this count.

22. Under the Doctrine of *Respondeat Superior*, Defendant Twitter has violated Mass. General Laws chapter 12, §§ 11H-11I. It has for the purpose of limiting the two Plaintiffs' Constitutional right of freedom of expression

- intimidated them by means of libel as well as by means of intentional infliction of emotional distress and
- threatened them with a cutoff of access to the preeminent World Wide Web discussion platform, which is necessary to the marketing and sales efforts of the two Plaintiffs.

23. Defendant Twitter must forthwith cease to violate Mass. General Laws chapter 12, §§ 11H-11I, and must forthwith restore both the @ThorsProvoni Twitter account and also the @Epistemography Twitter account. Defendant Twitter must also fully compensate the two Plaintiffs according to the aforesaid statutes.

Compensation for Damages, for Torts, for Statutory Violations, and for Costs

WHEREFORE, the Plaintiffs pray that, after trial, a judgment be entered in their favor and against the Defendant; that compensations for damages and torts be awarded to the Plaintiffs in an amount to be determined at trial, plus interest and costs; and that the Defendant be compelled to undertake preemptive and curative actions to correct and remedy reputational and emotional harm that the Defendant may cause in the future, is causing, or has already caused to the Plaintiffs.

Jury Demand

In accordance with Massachusetts Rule of Civil Procedure 38 (b), the Plaintiffs hereby demand trial by jury with respect to all claims or issues so triable.

Dated: January 25, 2019

Respectfully submitted by

DocuSigned by:

Joachim Carlos Santos Martillo

20693E1BA8E44AB...
Joachim Martillo

75 Bailey St. Ste 1L

Joachim.CS.Martillo@gmail.com

617-276-5788

Pro se

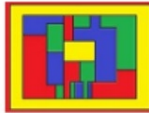
Epistemography LLC

(Joachim Martillo, Manager, USPTO Registration: 76,552)

75 Bailey St. Ste 1L

ThorsProvoni@protonmail.com

617-276-5788



Joachim Martillo
Epistemography LLC

"Precisely defining metes and bounds"

75 Bailey Street #1L
Dorchester, MA 02124
Tel 617-276-5788
Fax 617-506-0011
ThorsProvoni@protonmail.com



STATEMENT OF DAMAGES G.L. c. 218, § 19A(a)	DOCKET NO.	Trial Court of Massachusetts
PLAINTIFF(s) Joachim Martillo, Epistemography LLC	DEFENDANT(s) Twitter, Inc.	DATE FILED Jan 25, 2019
INSTRUCTIONS: THIS FORM MUST BE COMPLETED AND FILED WITH THE COMPLAINT OR OTHER INITIAL PLEADING IN ALL DISTRICT AND BOSTON MUNICIPAL COURT CIVIL ACTIONS SEEKING MONEY DAMAGES.		COURT DIVISION Dorchester Division, Boston Municipal Court
TORT CLAIMS		AMOUNT
A. Documented medical expenses to date: 1. Total hospital expenses: \$ _____ 2. Total doctor expenses: \$ _____ 3. Total chiropractic expenses: \$ _____ 4. Total physical therapy expenses: \$ _____ 5. Total other expenses (<i>describe</i>) _____ \$ _____ <div style="text-align: right;">SUBTOTAL: \$ _____</div>		
B. Documented lost wages and compensation to date:		\$ _____
C. Documented property damages to date:		\$ _____
D. Reasonably anticipated future medical and hospital expenses:		\$ _____
E. Reasonable anticipated lost wages:		\$ _____
F. Other documented items of damage (<i>describe</i>): <u>Reputations, mental state, and ability to exercise Constitutional right of freedom of speech.</u>		\$ 25,000.00
G. Brief description of Plaintiff's injury, including nature and extent of injury: <u>Libel per se, emotional distress, and interference with exercise of Constitutional right of freedom of speech under Mass. Civil Rights Act.</u>		
For this form, disregard double or treble damage claims; indicate single damages only. TOTAL:		\$ 25,000.00
CONTRACT CLAIMS		AMOUNT
<input checked="" type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a)		
Provide a detailed description of the claim(s): _____		\$ _____
_____		\$ _____
_____		\$ _____
For this form, disregard double or treble damage claims; indicate single damages only. TOTAL:		\$ _____
ATTORNEY FOR PLAINTIFF (OR UNREPRESENTED PLAINTIFF): <i>Joachim Martillo</i> 1/25/2019 SIGNATURE DATE Joachim Martillo & Epistemography LLC PRINT OR TYPE NAME B.B.O.# 75 Bailey St. Ste. 1L ADDRESS Dorchester Center, MA 02124	DEFENDANT'S NAME AND ADDRESS: Twitter, Inc. (Attention of General Counsel: Ms. Vijaya Gadde Esq.) 1355 Market Street Suite 900 San Francisco, CA 94103, United States of America	
CERTIFICATION PURSUANT TO SJC RULE 1:18: I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.		
Signature of Attorney on Record:		Date:

BMC DORCHESTER DIVISION
518 WASHINGTON ST
DORCHESTER CENTER, MA 02124
(617) 288 9500

Bank ID: 1340
Merchant ID: 000023008360
Term ID: 004
Clerk ID: 4

Sale

XXXXXXXXXXXX5919

VISA

Entry Method: Chip

Total: \$ 380.00

01/25/19 10:56:37
Inv #: 000001 Appr Code: 171164
Apprvd: Online Batch#: 025001
Retrieval Ref #: 00100001

VISA DEBIT
AID: A0000000031010
TS1: 6800
TVR: 8080000000

Customer Copy

ENCRYPTED TRANSACTION

Retain for Proof of Payment

BMC Dorchester
518 Washington Street
Dorchester MA 01924-
Receipt 84/85

Date 01/25/20

19
Case Number 19070000023
Description 19070000023 Santos Martillo, Joac
him Carlo v. Twitter, Inc.
Received From Santos Martillo, Joachim Carlo

On Behalf Of Santos Martillo, Joachim Carlo
Payment Type Amount Reference
CREDIT CARD 380.00 171164
Applied Type Amount
Certificates/Copies/Summons 5.00
Billing Fee 195.00
General Revenue Fund 180.00
Change .00

Balance Due .00
Clerk FAKHED Trans Date 01/25/201

01/25/19
Comment:

FORT POINT
25 DORCHESTER AVE RM 1
BOSTON
MA

02205-9761
2400790109

01/25/2019 (800)275-8777 2:09 PM

Product Description	Sale Qty	Final Price
PM 2-Day Flat Rate Env (Domestic) (SAN FRANCISCO, CA 94103) (Flat Rate) (Expected Delivery Date) (Monday 01/28/2019) (USPS Tracking #) (9510 8145 7858 9025 4647 13)	1	\$6.70
Insurance (Up to \$50.00 Included)	1	\$0.00
Sign Conf	1	\$3.00
Total		\$9.70

Debit Card Remit'd \$9.70
(Card Name:VISA)
(Account #:XXXXXXXXXXXX1420)
(Approval #:
(Transaction #:774)
(Receipt #:028775)
(Debit Card Purchase:\$9.70)
(Cash Back:\$0.00)
(AID:A0000000980840 Chip)
(AL:US DEBIT)
(PIN:Verified)

Includes up to \$50 insurance

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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Commonwealth of Massachusetts

Dorchester, ss.

Boston Municipal Court Department
of the
Trial Court of Massachusetts

Joachim Carlo Santos Martillo and)
Epistemography LLC)
Plaintiffs)
)
vs.)
)
Twitter, Inc.)
Defendant)
_____)

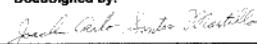
Civil Action No.: 1907CV0023

Certificate of Service (submitted January 29, 2019)

I hereby certify that on January 28, 2019 a copy of the *Complaint and Demand for Jury Trial* in the above captioned proceeding has been served upon Defendant Twitter, Inc. (General Counsel Ms. Vijaya Gadde Esq.) by USPS Priority Mail sent on January 25, 2019 to Twitter, Inc., 1355 Market Street Suite 900 (Attention of Corporate Counsel Ms. Vijaya Gadde, Esq.), San Francisco, CA 94103.

Dated: 1/29/2019

Respectfully submitted by

DocuSigned by:

20693E1B48F44AB
Joachim Martillo
75 Bailey St. Ste 1L
Dorchester Center, MA 02124-3724
Joachim.CS.Martillo@gmail.com
ThorsProvoni@protonmail.com
617-276-5788
Pro se

BOSTON MUNICIPAL COURT
DORCHESTER DIVISION

19 JAN 29 AM 8:40

03/11/19



Quick Tools

Mail & Ship

Track & Manage

Postal Store

Business

International

Help

USPS Tracking®

[Tracking](#)

[FAQs](#)

[Track Another Package](#) +

Tracking Number: 9510814578589025464713

[Remove](#) X

On Time

Status

Expected Delivery on

Delivered

MONDAY

January 28, 2019 at 12:18 pm
Delivered
SAN FRANCISCO, CA 94103

28

JANUARY
2019

by
8:00pm

[Get Updates](#) v

Delivered

[Text & Email Updates](#) v

[Proof of Delivery](#) v

[Tracking History](#) ^

January 28, 2019, 12:18 pm

Delivered
SAN FRANCISCO, CA 94103

Your item was delivered at 12:18 pm on January 28, 2019 in SAN FRANCISCO, CA 94103. The item was signed for by J B.

January 28, 2019, 11:18 am

Out for Delivery
SAN FRANCISCO, CA 94103

January 28, 2019, 11:08 am

Sorting Complete
SAN FRANCISCO, CA 94103

January 27, 2019, 9:22 am

Arrived at Hub
SAN FRANCISCO, CA 94103

January 27, 2019, 3:20 am

Departed USPS Regional Destination Facility
SAN FRANCISCO CA DISTRIBUTION CENTER

January 27, 2019, 3:20 am

Arrived at USPS Regional Destination Facility
SAN FRANCISCO CA DISTRIBUTION CENTER

January 26, 2019

In Transit to Next Facility

January 25, 2019, 11:11 pm

Arrived at USPS Regional Origin Facility
NASHUA NH DISTRIBUTION CENTER

January 25, 2019, 6:33 pm

Departed Post Office
BOSTON, MA 02205

January 25, 2019, 2:08 pm

USPS in possession of item
BOSTON, MA 02205



January 28, 2019

Dear Joachim Martillo:

The following is in response to your request for proof of delivery on your item with the tracking number: **9510 8145 7858 9025 4647 13.**

Item Details

Status:	Delivered
Status Date / Time:	January 28, 2019, 12:18 pm
Location:	SAN FRANCISCO, CA 94103
Postal Product:	Priority Mail®
Extra Services:	Insured Signature Confirmation™
Actual Recipient Name:	J B

Note: Actual Recipient Name may vary if the intended recipient is not available at the time of delivery.


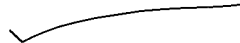
Shipment Details

Weight: 4.0oz

Destination Delivery Address

Street Address:	1355 MARKET ST STE 900
City, State ZIP Code:	SAN FRANCISCO, CA 94103-1337

Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004