

## PART 11

At an IAS Part \_\_\_\_\_, of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse thereof, 60 Centre Street, New York, New York on the day of January, 2009.

PRESENT

HON. JOAN A. WADDEN J.S.C.

J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

In the matter of the Application of LISKULA COHEN,

Petitioner,

for an order pursuant to section 3102(c)of the Civil Practice Laws and Rules to compel disclosure from

GOOGLE, INC. and/or its subsidiary, BLOGGER.COM.

Respondent,

of the identity of the defendants JOHN DOE and/or JANE DOE being unknown to the petitioner, in an action about to be commenced.

Index No.: 1000 17/09

ORDER TO SHOW CAUSE IN LIEU OF PETITION

In lieu of petition pursuant to Civil Practice Laws and Rules (CPLR) § 403(d), UPON the reading and filing of the Affirmation of Daniel J. Schneider, Esq. with memorandum of law, affirmed December 19, 2008, the Affidavit of Liskula Cohen, and the exhibits annexed thereto, and all other papers and proceedings heretofore had herein, it is

New York, on the day of January, 2009, at 9:30 a.m., or as soon thereafter as counsel can be heard why an Order should not be made, pursuant to CPLR § 3102(c), compelling preaction disclosure by Google, Inc. and/or its subsidiary Blogger.com of the identity or identities, including, but not limited to the name, address, telephone number and email of the person or persons who posted the weblog located at the URL <a href="http://skanksnyc.blogspot.com">http://skanksnyc.blogspot.com</a> (hereinafter the "Bloggers"), which was posted under the umbrella of <a href="http://blogger.com">http://blogger.com</a> and the dates and times at which these weblogs were posted on the ground that without said disclosure, a summons and complaint cannot be served upon the Bloggers and such other and further relief as the Court deems just and proper (including motion costs);

ORDERED that service of a copy of this Order to Show Cause, and all supporting papers upon which same is based, be made upon Liskula Cohen locate at care of Wagner Davis P.C. 99 Madison Avenue, Eleventh Floor, New York, New York, 19016 and pursuant to CPER § 311, be made upon an officer of Google New York or other person authorized to accept service at 76 Ninth Avenue, Fourth Floor, New York, New York, New York 19011 and mail a copy of the same upon Google, Inc. 1600 Amphitheatre Parkway, Mountain View, CA

94043 on or before January 12,2009 shall be deemed good and sufficient service.

And of 13 feerellar

ENTER:

HON. JOAN A. MADO

by Jan. 22, 2009

ENIEK:

.c.

copies to The Clerky Part (851)

At an IAS Part, of the Supreme Court
of the State of New York, held in and for the
County of New York, at the
Courthouse thereof, 60 Centre Street,
New York, New York on the
day of January, 2009.

PRESENT

COHEN,

Hon.	
	J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

In the matter of the Application of LISKULA

Petitioner,

for an order pursuant to section 3102(c)of the Civil Practice Laws and Rules to compel disclosure from

GOOGLE, INC. and/or its subsidiary, BLOGGER.COM,

Respondent,

of the identity of the defendants JOHN DOE and/or JANE DOE being unknown to the petitioner, in an action about to be commenced.

Index No.: 100012/01

ORDER TO SHOW CAUSE IN LIEU OF PETITION

In lieu of petition pursuant to Civil Practice Laws and Rules (CPLR) § 403(d), UPON the reading and filing of the Affirmation of Daniel J. Schneider, Esq. with memorandum of law, affirmed December 19, 2008, the Affidavit of Liskula Cohen, and the exhibits annexed thereto, and all other papers and proceedings heretofore had herein,

it is

ORDERED that Defendants show cause at the Supreme Court of the State of New York, in Room \_\_\_\_ at the Courthouse located at 60 Centre Street, New York, New York, on the \_\_\_ day of January, 2009, at 9:30 a.m., or as soon thereafter as counsel can be heard why an Order should not be made, pursuant to CPLR § 3102(c), compelling preaction disclosure by Google, Inc. and/or its subsidiary Blogger.com of the identity or identities, including, but not limited to the name, address, telephone number and email of the person or persons who posted the weblog located at the URL <a href="http://skanksnyc.blogspot.com">http://skanksnyc.blogspot.com</a> (hereinafter the "Bloggers"), which was posted under the umbrella of <a href="http://blogger.com">http://blogger.com</a> and the dates and times at which these weblogs were posted on the ground that without said disclosure, a summons and complaint cannot be served upon the Bloggers and such other and further relief as the Court deems just and proper (including motion costs);

SUFFICIENT CAUSE BEING ALLEGED THEREFORE, it is further ORDERED that service of a copy of this Order to Show Cause, and all supporting papers upon which same is based, be made upon Liskula Cohen locate at care of Wagner Davis P.C., 99 Madison Avenue, Eleventh Floor, New York, New York, 10016 and pursuant to CPLR § 311, be made upon an officer of Google New York or other person authorized to accept service at 76 Ninth Avenue, Fourth Floor, New York, New York 10011 and mail a copy of the same upon Google, Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043 on or before \_\_\_\_\_\_\_ shall be deemed good and sufficient service.

ENTER:	
	J.S.C.

# Affirmation of Dan Schneider

SUPREME COURT	OF	THE	${\bf STATE}$	OF	NEW	YOR	K
COUNTY OF NEW	ΥO	RK					

In the matter of the Application of LICVIII A

In the matter of the Application of LISKULA COHEN,

Petitioner,

for an order pursuant to section 3102(c)of the Civil Practice Laws and Rules to compel disclosure from

AFFIRMATION IN SUPPORT OF ORDER TO SHOW CAUSE COMPELLING DISCLOSURE OF IDENTITY WITH MEMORANDUM OF LAW

GOOGLE, INC. and/or its subsidiary, BLOGGER.COM,

Index #:

Respondent,

of the identity of the defendants JOHN DOE and/or JANE DOE being unknown to the petitioner, in an action about to be commenced.

\_\_\_\_\_

DANIEL J. SCHNEIDER, an attorney duly admitted to practice before the Courts of the State of New York, affirms under penalty of perjury, pursuant to Civil Practice Laws and Rules (CPLR) § 2106, as follows:

1. I am associated with Wagner Davis P.C. ("WD"), attorney for Liskula Cohen ("Cohen") in the above captioned petition and I am familiar with all the facts and circumstances set forth in this affirmation. I make this affirmation in support of Cohen's application for an order, pursuant to CPLR § 3102(c), for pre-action disclosure, and compelling Google, Inc. and/or its subsidiary Blogger.com (hereinafter collectively referred to as "Google") to disclose the identity of the person or persons (hereinafter the "Bloggers") who posted five (5) weblogs, which contain defamatory statements about Cohen on websites under the operation and control of Google.

- 2. Briefly, the application should be granted because the unknown defendants created a defamatory blog entitled "Skanks in NYC" located at the uniform resource locator ("URL") <a href="http://skanksnyc.blogspot.com">http://skanksnyc.blogspot.com</a> and posted entries, including photographs, captions to the photographs and commentary solely about Liskula Cohen that describe her as a "Skank" and a "Ho" and include other defamatory statements concerning her appearance, hygiene and sexual conduct that are malicious and untrue. Upon information and belief, some of the pictures posted on the blog appearing with her name do not even depict Cohen. The blog constitutes defamation per se in that it obviously impugns the chastity of Cohen and further, it negatively reflects on her business. Cohen is a professional full-time model. I am advised that this blog has been mentioned to Cohen during by two people who work with one of her modeling clients, who mentioned the blog because they were concerned about Cohen's image and its relationship to the client's products.
- 3. In connection with this application, my office has made attempts to ascertain the identity of these Bloggers directly from Google, however has failed and refused to provide the names and other identifying information because it claims to do so would violate its privacy policy. Google has indicated, however, that it would comply with an order directing it to furnish identifying information about the person or persons who posted the remarks that defamed Cohen.
- 4. In this affirmation and the annexed affidavit of Cohen, we have set forth facts sufficient for this Court to compel Google to disclose the identity of the anonymous Bloggers who posted defamatory photographs, captions to the photographs and other commentary on Google's website. It is respectfully submitted and will be demonstrated below that this

<sup>&</sup>lt;sup>1</sup> "Skank" is defined as "One who is disgustingly foul or filthy and often considered sexually promiscuous. Used especially of a woman or girl." *The American Heritage* Dictionary of the English Language, Fourth Edition. Retrieved November 07, 2008, from Dictionary.com website: <a href="http://dictionary.reference.com/browse/skanky">http://dictionary.reference.com/browse/skanky</a>.

<sup>&</sup>lt;sup>2</sup> "Ho" is defined as a slang word for a prostitute and a slang alteration of the word "whore." *The American Heritage® Dictionary of the English Language. Fourth Edition.* Retrieved November 07, 2008, from Dictionary.com website: <a href="http://dictionary.reference.com/browse/ho">http://dictionary.reference.com/browse/ho</a>.

application should be granted in all respects and result in an order requiring google to disclose the Bloggers' name(s), address(es), email address(es), phone number(s), IP Address(es) and any other information that it may possess that would assist in ascertaining the Bloggers' identity.

- 5. On August 21, 2008, five (5) different weblogs (hereinafter "Blogs") were posted on Blogger.com together under the URL, <a href="http://skanksnyc.blogspot.com">http://skanksnyc.blogspot.com</a>. Copies of the Blogs are annexed hereto as Exhibits A-F. These Blogs are unmistakably about Cohen, the movant in this application, and the would be plaintiff in a defamation action if only she could ascertain the identity of the person or persons who posted the Blogs (hereinafter the "Bloggers"). Under available case law and the facts and circumstances here, Cohen must be entitled to "unmask" the Bloggers and obtain their identities and the time and date that they posted the Blog.
- 6. In New York, "[a] court may allow pre-action discovery if it is needed to aid a party in bringing an action against a potential defendant, but it may do so only by court order."

  Admission Consultants, Inc. v. Google, Inc., N.Y.L.J, 12/8/08, p. 18, col. 2 (N.Y. Cty. Index No. 115190/07, Cahn, J.). In order to be to be entitled to this relief, however, "the moving party must first show that it 'has a meritorious cause of action and that the information being sought is material and necessary to the actionable wrong." Id. citing Liberty Imports, Inc. v. Bourguet, et al., 146 A.D.2d 535, 536 (1st Dept. 1989); see also In the Matter of Greenbaum v. Google, Inc, 18 Misc. 3d 185, 188 (Sup. Ct. N.Y.C. 2007).
- 7. That we are aware, only three (3) Courts in New York have been confronted with unmasking people who post anonymously on the internet for alleged defamatory statements. See Admission Consultants, supra; Greenbaum, supra; and Admission Consultants v. McGraw Hill Publishing Co. (N.Y. Cty. Index No. 111503/2007, Feinman, J.). In the first two cases, the petition was denied, though in latter, the petition was granted (the granted petition offered no analysis to its reasoning, but the Justice Cahn Admission Consultants case does state the

statements dealt with there were discriminatory). The two petitions which were denied were because the petitioners could not even state a cause of action of defamation. As the Court in Greenbuam stated "the statements on which the petitioner seeks to base her defamation claim are plainly inactionable as a matter of law." 18 Misc. 3d at 188. Thus these Courts declined to "unmask" the blogger.

- 8. Cohen can put forth a meritorious cause of action of defamation and more specifically, libel. According to <u>Admission Consultants</u>, <u>Inc. v. Google</u>, <u>supra</u>, plaintiff must prove four (4) elements to be successful on a libel claim: "(1) a false and defamatory statement of fact; (2) regarding the plaintiff; (3) which is published to a third party; and which (4) results in injury to plaintiff." <u>Id.</u>, <u>citing Penn Warranty Corp. v. DiGiovanni</u>, 10 Misc. 3d 998, 1002 (Sup. Ct. N.Y.C. 2005).
- 9. In this case, the Court need only to examine the Blog to confirm that the postings are defamatory. Cohen will proceed under a theory that the Blog postings are libelous *per se* because they called into question her chastity and as a professional model, they relate to her reputation and her business. The explicit definition of libel *per se* is "any written or printed article...[which] tends to expose the plaintiff to public contempt, ridicule, aversion or disgrace or induce an evil opinion of him in the minds of right-thinking persons, and to deprive him of their friendly intercourse in society." <u>Rinaldi v. Holt, Rinehart & Winston, Inc.</u>, 42 N.Y.2d 369, 379 (1977). The statements posted in this case fall into this definition since the Court of Appeals holds that "written charges imputing unchaste conduct to a woman are libelous per se." <u>James v.</u> Gannett Co., Inc., 40 N.Y.2d 415, 419 (1976).
- 10. In this case, the statements which were made on the Blog unmistakably imputed Cohen's chastity and therefore are libelous *per se*. The Blog calls Cohen a "skank" or "skanky"

several times. As noted above, "skank" is "One who is disgustingly foul or filthy and often considered sexually promiscuous. Used especially of a woman or girl."

- opening wide to take that 'thing' into my mouth AGAIN." This caption implies that Cohen is a promiscuous person with a propensity for performing oral sex. Further, the Blog describes Cohen's actions as "acting like [a] ho." Also note above, the word "ho" is defined as a short form of the word "whore." Also it describes Cohen as being a "psychotic, lying, whoring...skank." These statements are certainly intended to "expose [Cohen] to public contempt, ridicule, aversion, disgrace and to induce an evil opinion of [her] in the minds of right-thinking persons, and to deprive [her] of [her] friendly intercourse in society." Rinaldi, supra. Based on the fact that the Blogger's statements made about Cohen impute her chastity and are so severe, they constitute libel per se and thus are defamatory. See Gannett Co., supra.
- 12. Cohen has sworn to the fact that the allegations in the statements imputing her chastity, describing her as a whore and being disgustingly foul or filthy and being sexually promiscuous are completely untrue. See Cohen's Affidavit attached hereto.
- 13. As to whether the statements posted on the Blog are factual is a question of law. See Rinaldi, supra at 381. The Blogger(s) statements and specifically their use of the words "ho" and "skank" clearly go far beyond asserting opinions. They are used to factually define Cohen.
- 14. Moreover, the statements clearly refer to Cohen. In the earliest post on the Blog, the Bloggers state, "I would have to say that the first place award for 'Skankiest in NYC" would have to go to Liskula Gentile Cohen." It explicitly states Cohen's name as well as a picture of her. Cohen's full name, first name and picture are used throughout the postings. There can be no doubt that the defamatory statements were made about Cohen.

- 15. Further, by posting the writings and pictures on the Blog, the Bloggers broadcast the defamatory statements on the internet and clearly published and broadcast the statements to many more people than just Cohen. They were broadcast to anyone who could find the page. Indeed, as noted above, at least two people who work with one of Ms. Cohen's clients have mentioned the Blog's existence to her and expressed concern about her suitability to serve as a spokesperson and representative for the client's products.
- 16. Finally, with respect to injury to Cohen, she does not have to prove damages. As noted above, the postings on the Blog constitute libel per se. See Gannett Co., Inc., 40 N.Y.2d at 419. That being the case, "the law presumes damage to the slandered individual's reputation so that the cause is actionable without proof of special damages." 60 Minute Man v. Kossman, 161 A.D.2d 574, 575 (2d Dept. 1990). Therefore Cohen "need not establish damages as an element of [her] defamation cause of action, and...failure to do so [would] not require [dismissal]." Id. at 576. Despite the fact that proving damages is not necessary in this case, Cohen still demonstrated them in her affidavit. As she stated, she has suffered damages including personal humiliation, mental anguish and damage to her reputation and standing in the community and in her industry.
- 17. As to whether the information is material and necessary, if Cohen is unable to ascertain the identities of the Bloggers, she will be unable to bring a defamation suit at all since she will not know who the defendants are who she needs to sue. Thus, the information sought, the identity of the Bloggers is not only material and necessary to the actionable wrong, if she is denied the relief sought herein, it will foreclose on her ability to even bring this cause of action.
- 18. Since Cohen is able to state a cause of action of defamation against these anonymous defendants, the Court must order, pursuant to CPLR § 3102(c), pre-action disclosure by Google, Inc. and/or Blogger.com and order them to identify the Bloggers who posted the defamatory Blog about Cohen.

19. No prior applications have seen submitted

WHEREFORE, it is respectfully requested that an order be issued, pursuant to CPLR § 3102(c), for pre-action disclosure, and compelling Google, Inc. and/or Blogger.com to identify the Bloggers who posted the defamatory Blog about Cohen, together with such other and further relief as the court deems proper.

Dated: New York, New York December 19, 2008

DANIEL J. SCHNEIDER ESQ.

## Affidavit of Liskula Cohen

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK			
In the matter of the Application of LISKULA COHEN,			
Petitioner,	AFFIDAVIT IN SUPPORT		
for an order pursuant to section 3102(c)of the Civil Practice Laws and Rules to compel disclosure from	OF ORDER TO SHOW CAUSE COMPELLING DISCLOSURE OF IDENTITY		
GOOGLE, INC. and/or its subsidiary, BLOGGER.COM,	Index #:		
Respondent,			
of the identity of the defendants JOHN DOE and/or JANE DOE being unknown to the petitioner, in an action about to be commenced.			

LISKULA COHEN, being duly sworn, deposes and says:

SS.:

- 1. I am the petitioner in the captioned proceeding and submit this affidavit in support of an application for the Court to order Google, Inc. and/or Blogger.com also known as Blogspot.com (which I believe are controlled, owned and operated by Google, Inc.) to reveal the identity of the person or persons who posted weblogs about me which are defamatory.
- 2. On or about October 9, 2008, I "googled" my name and was directed to the website <a href="http://skanksnyc.blogspot.com">http://skanksnyc.blogspot.com</a> where I came upon a weblog (hereinafter referred to as "Blog") entitled "Skanks in NYC" with five (5) entries, all of which were listed as posted on August 21, 2008. I understand that August 21, 2008 is the date that this Blog was published in a permanent form on the internet. Based on the fact that my full name and photographs of me are

DS0388 1

STATE OF NEW YORK

COUNTY OF NEW YORK )

published on this Blog, I know the contents are about me. A copy of the entire Blog is attached hereto as Exhibit A.

- 3. I was shocked and embarrassed to see that the photographs, captions to the photographs and the other posted commentary were used to describe me as a promiscuous woman, who is filthy, disgusting, foul and a whore, using words such as "skank" and "ho." The statements and suggestions made on the Blog are malicious and untrue. I am advised by counsel that statements which impute unchastity of a woman, when untrue, are defamatory by nature. In addition, for the past twenty (20) years, I have been a professional model and defamatory statements describing me as a "skank" and a "ho" affect my reputation and desirability for endorsing products.
- 4. The individual entries to the Blog speak for themselves. They are so clearly aimed at casting me as filthy, disgusting, foul, dishonest, promiscuous, a "skank" and a whore and are unwarranted, hurtful, embarrassing, potentially damaging to my reputation in the modeling industry and, significantly, they are flatly untrue.
- 5. The modeling industry is very much dependant on appearance and reputation. The Blog could compromise my reputation. To date, the Blog has been discovered by at least two people with an existing client who brought the Blog to my attention when I was working with them. These people mentioned the Blog and expressed concern about my suitability to serve as a spokesperson and representative for the client's products.

DS0388

<sup>&</sup>lt;sup>1</sup> Importantly, not all of the photographs purporting to be me are in fact photographs of me.

6. Based on all the foregoing, it is respectfully requested that the Court to order Google, Inc. and/or Blogger.com also known as Blogspot.com, which are controlled, owned and operated by Google, Inc. to reveal the identity of the person or persons who posted the Blog and the other information described in my attorney's affirmation.

LISKULA COHEN

Sworn to before me this

day of December, 2008

Notary Rublic

DANIEL J. SCHNEIDER
Notary Public, State of New York
No. 02SC6188816
Qualified in Queens County
Commission Expires June 16, 2012

# Exhibit A

SEARCH BLOG FLAG BLOG Next Blog»

Create Blog | Sign In

## SKANKS IN NYC

THURSDAY, AUGUST 21, 2008

### Mr. Ed's wife Mrs. Ed



Horsey Face......Got any carrots???

POSTED BY ANONYMOUS AT 12:38 PM 1 COMMENTS LABELS: LISKULA

BLOG ARCHIVE

▼ 2008 (5)

▼ August (5)

Mr. Ed's wife Mrs. EdIm Skanky and I know and I really like to show it....Liskula's 40 year old MUG PICMore skanky pics for our #1 skanky superstar Lis...

> Ok so there are so many nasty bithces in the N...

ABOUT ME

ANONYMOUS

VIEW MY COMPLETE PROFILE

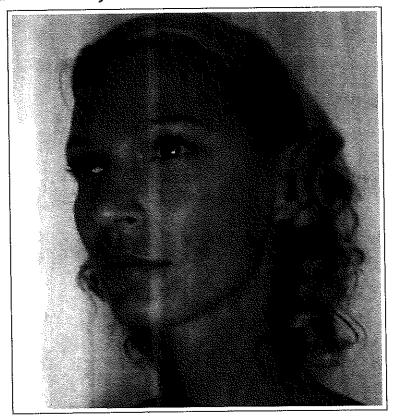
# Im Skanky and I know and I really like to show it......I'm skanky and I know it clap your hands!!!!!!



nothing like opening wide to take that \*thing\* into my mouth AGAIN.

POSTED BY ANONYMOUS AT 12:21 PM 0 COMMENTS LABELS: LISKULA

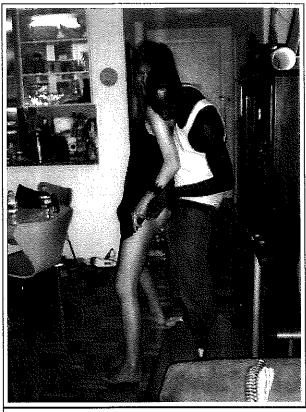
## Liskula's 40 year old MUG PIC



Don't you guys think she should grow and an get on with her life? I mean really, 40 year old women (or in her case that look 40) shouldn't be out at night looking and acting like ho's.

What kind of guy wants a skank bitch like that?

POSTED BY ANONYMOUS AT 12:12 PM 1 COMMENTS LABELS: LISKULA





More skanky pics for our #1 skanky superstar Liskula Cohen.

POSTED BY ANONYMOUS AT 12:09 PM 1 COMMENTS LABELS: LISKULA



Page 4 of 4 SKANKS in NYC

Ok so there are so many nasty bithces in the NYC scene, so now we

I would have to say that the first place award for "Skankiest in NYC" would have to go to Liskula Gentile Cohen. How old is this skank? 40 something? She's a psychotic, lying, whoring, still going to clubs at her age, skank.

Yeah she may have been hot 10 years ago, but is it really attractive to watch this old hag straddle dudes in a nightclub or lounge? Desperation seeps from her soul, if she even has one.

Enjoy the pic.

can write about them.

POSTED BY ANONYMOUS AT 11:59 AM 1 COMMENTS LABELS: LISKULA

Subscribe to: Posts (Atom)

# Exhibit B

SEARCH BLOG | FLAG BLOG | Next Blog»

Create Blog | Sign In

### SKANKS IN NYC

THURSDAY, AUGUST 21, 2008

### Mr. Ed's wife Mrs. Ed



Horsey Face......Got any carrots???

POSTED BY ANONYMOUS AT 12:38 PM LABELS: LISKULA

#### 1 COMMENTS:

liveandlove said...

After finding your blog I stopped to think about what kind of monster you must really be. To target a woman so aggressively to attack even the stupidest of ill facts. I feel sorry for you "anonymous little blogger". Why do you hide behind that anonymous title? Are you afraid of what Liskula can do to you? She is a very powerful woman, as I am sure you know. What exactly has she done to you? Does your boyfriend want her? Probably, most men and women want her. She is tall, thin, beautiful, super kind and generous to a fault. Is it her success? Is it the fact that everybody loves her and she gets respect everywhere she goes? Are you one of those little dumpy girls who hang off her every word? Or do you wait three hours in line at a club, when she breezes right in?

BLOG ARCHIVE

₹ 2008 (5)

▼ August (5)

Mr. Ed's wife Mrs. EdIm Skanky and I know and I really like to show it....Liskula's 40 year old MUG PICMore skanky pics for our #1 skanky superstar Lis...

> Ok so there are so many nasty bithces in the N...

ABOUT ME

ANONYMOUS

VIEW MY COMPLETE PROFILE

I think you should realize that green does not become you. Your jealousy here is so painful. Go to therapy, get some help. You can love yourself too. It must be hard for a person like you to see Liskula with all the confidence in the world, and you hide behind a computer. Don't try to slander a wonderful woman. Even though she would laugh off your jealous fit, she is so used to pathetic little people like you. It is not kind, and will get you nowhere in life. You have taken her personal pictures, which is more than likely illegal, I will be sure to let her know, and I am sure she will contact her lawyers right away. And just so you know you have your facts wrong. Even if she was 40 she wouldn't care. You know you would give a limb to look like her, notice on the black and white picture, not a wrinkle even close to coming. The woman is flawless. As for her going out at night, yeah she likes to have fun, and she gets invited to everything, every night. She is friendly with every club owner and likes to enjoy their company. While you clearly prefer to sit at home and spew hateful words. Funny enough, if you knew her, you would be so embarrassed for what you have put on this blog.

May you be forgiven for your jealousy and hate. It must be horrible to be you. And wonderful to be Liskula. Another thing you may want to know is that you have posted a picture that is not even her....silly silly fat girl. Tell me are you easier to walk over or around? And just so you know, after having this page up for so long and only having twenty visitors...lol..your not even a good blogger. Get a life, try and make your Mother proud, as Liskula's is.....

OCTOBER 9, 2008 6:30 PM

Post a Comment

Home

Older Post

Subscribe to: Post Comments (Atom)

# Exhibit C

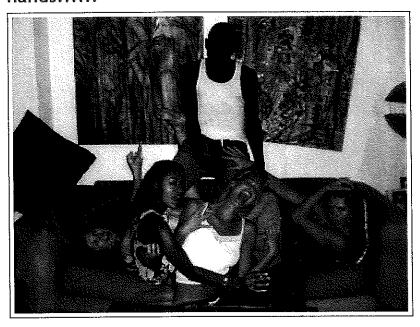
| SEARCH BLOG | FLAG BLOG | Next Blog |

Create Blog | Sign In

### SKANKS IN NYC

THURSDAY, AUGUST 21, 2008

# Im Skanky and I know and I really like to show it.....I'm skanky and I know it clap your hands!!!!!!



nothing like opening wide to take that \*thing\* into my mouth AGAIN.

POSTED BY ANONYMOUS AT 12:21 PM LABELS: LISKULA

#### O COMMENTS:

Post a Comment

Newer Post Home

Older Post

Subscribe to: Post Comments (Atom)

BLOG ARCHIVE

▼ 2008 (5)

▼ August (5)

Mr. Ed's wife Mrs. EdIm Skanky and I know and I really like to show it....Liskula's 40 year old MUG PICMore skanky pics for our #1 skanky superstar Lis...

> Ok so there are so many nasty bithces in the N...

ABOUT ME

ANONYMOUS

VIEW MY COMPLETE PROFILE

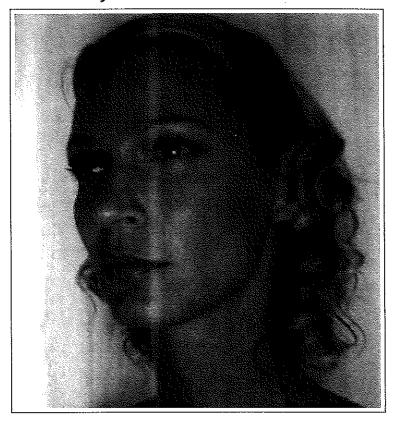
# Exhibit D

Create Blog | Sign In

## SKANKS IN NYC

THURSDAY, AUGUST 21, 2008

### Liskula's 40 year old MUG PIC



BLOG ARCHIVE

▼ 2008 (5)

▼ August (5)

Mr. Ed's wife Mrs. Ed
Im Skanky and I know and I
really like to show it....
Liskula's 40 year old MUG PIC
More skanky pics for our #1
skanky superstar Lis...

> Ok so there are so many nasty bithces in the N...

ABOUT ME ANONYMOUS

VIEW MY COMPLETE PROFILE

Don't you guys think she should grow and an get on with her life? I mean really, 40 year old women (or in her case that look 40) shouldn't be out at night looking and acting like ho's.

What kind of guy wants a skank bitch like that?

POSTED BY ANONYMOUS AT 12:12 PM LABELS: LISKULA

#### 1 COMMENTS:

liveandlove said...

FLAWLESS...THE PERFECT WOMAN....AND JUST SO YOU KNOW, I KNOW WHO YOU ARE.....OYU SHOULD TALK TO GOOGLE ABOUT THE PRIVACY ACTS, ONCE YOU BREAK THE TERMS OF SERVICE, YOUR IDENTITY IS GIVEN TO THOSE COMPLAINING ABOUT YOU...

OCTOBER 9, 2008 6:32 PM

Post a Comment

Newer Post

Home

Older Post

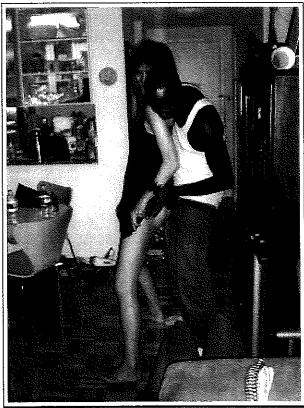
Subscribe to: Post Comments (Atom)

# Exhibit E

Create Blog | Sign In

## SKANKS IN NYC

THURSDAY, AUGUST 21, 2008





BLOG ARCHIVE

▼ 2008 (5)

▼ August (5)

Mr. Ed's wife Mrs. EdIm Skanky and I know and I really like to show it....Liskula's 40 year old MUG PICMore skanky pics for our #1 skanky superstar Lis...

> Ok so there are so many nasty bithces in the N...

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ANONYMOUS

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More skanky pics for our #1 skanky superstar Liskula Cohen.

POSTED BY ANONYMOUS AT 12:09 PM

LABELS: LISKULA

### 1 COMMENTS:

liveandlove said...

NOT EVEN LISKULA....LOL...

OCTOBER 9, 2008 6:33 PM

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## SKANKS IN NYC

THURSDAY, AUGUST 21, 2008



Ok so there are so many nasty bithces in the NYC scene, so now we can write about them.

I would have to say that the first place award for "Skankiest in NYC" would have to go to Liskula Gentile Cohen. How old is this skank? 40 something? She's a psychotic, lying, whoring, still going to clubs at her age, skank.

Yeah she may have been hot 10 years ago, but is it really attractive to watch this old hag straddle dudes in a nightclub or lounge? Desperation seeps from her soul, if she even has one.

Enjoy the pic.

POSTED BY ANONYMOUS AT 11:59 AM LABELS: LISKULA

### 1 COMMENTS:

BLOG ARCHIVE

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liveandlove said...

LOL...YEAH SHE IS SO DESPERATE THAT SHE HAS TO FIGHT THEM OFF WITH A STICK...YOU SEE HOW THE MEN AND WOMEN LOVE HER...DONT YOU...JEALOUS JEALOUS ...SO SAD....

OCTOBER 9, 2008 6:36 PM

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